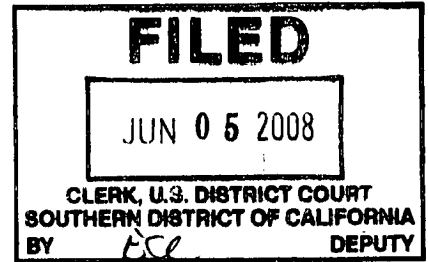


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HONOR LIFE, INC.



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

'08 CV 1008 L POR

HONOR LIFE, INC.,

Plaintiff,

v.

UNICORN TILE CORPORATION and
OCEAN CHARM, INC. d/b/a
AMERICAN TILE AND MARBLE
DESIGN, and DOES 1-20, inclusive,

Defendants.

CASE NO.: _____

COMPLAINT FOR COPYRIGHT
INFRINGEMENT AND DEMAND FOR JURY
TRIAL

Action Filed:
Trial Date: None set

Plaintiff Honor Life, Inc. ("HLI") submits this Complaint for Copyright Infringement and alleges:

PARTIES

1. Plaintiff HLI is a corporation of the state of California having its corporate headquarters and principal place of business located at 955 Park Center Drive, Vista, California 92081. HLI is in the business, *inter alia*, of creating, manufacturing, and selling decorative medallions made of natural stone, including the specific designs and drawings for the medallions identified herein.

2. On information and belief, defendant, UNICORN TILE CORPORATION ("Unicorn Tile"), is a corporation of the state of California having an office and place of business

1 at 2020 E. Orangethorpe Ave., Anaheim, CA 92806. On information and belief, Unicorn Tile is
2 in the business, *inter alia*, of importing and selling mosaic and water jet stone medallions and tile
3 borders to residential and commercial customers and otherwise conducts business in this judicial
4 district.

5 3. On information and belief, defendant, OCEAN CHARM INC. ("Ocean Charm"),
6 is a corporation of the State of California having an office and place of business at 2 Sidney Bay
7 Drive, Newport Coast, California 92657. On information and belief, Ocean Charm is doing
8 business as AMERICAN TILE AND MARBLE DESIGN ("American Tile"), with an office and a
9 place of business at 2125 E. Howell Ave., Suite B, Anaheim, CA 92806. On information and
10 belief, Ocean Charm d/b/a American Tile is in the business, *inter alia*, of importing and selling
11 water jet stone medallions and otherwise conducting business in this judicial district.

12 4. The true names and capacities, whether individual, corporate, associate or
13 otherwise of the fictitiously named DOE Defendants are unknown to Plaintiff at this time, who
14 therefore sues such Defendants by their fictitious names. Plaintiff further alleges that each of the
15 fictitious DOE Defendants is in some manner responsible for the acts and occurrences hereinafter
16 set forth. Plaintiff will amend this Complaint to show their true names and capacities when the
17 same are ascertained, as well as the manner in which each fictitious Defendant is responsible for
18 the damages sustained by Plaintiff.

19 5. Plaintiff is informed and believes and based thereon alleges that each Defendant
20 was the agent, alter-ego, joint venturer, servant and employee of each other Defendant, and in
21 performing the acts described in this Complaint, was acting in the scope of his, her, or its
22 authority with the consent of each other Defendant. Each Defendant ratified and/or authorized
23 the wrongful acts of each of the other Defendants.

24 6. The above named defendants and the fictitiously named DOE defendants
25 (collectively, the "Defendants") are jointly and severally liable and are legally responsible for the
26 wrongful conduct that caused the damages to Plaintiff as alleged in this Complaint.

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JURISDICTION AND VENUE

7. This is a suit for injunctive and other relief under the Copyright Act of 1976, 17 U.S.C. § 101 et seq., and for copyright infringement pursuant to 17 U.S.C. § 501.

8. This Court has subject matter jurisdiction over this action pursuant to 17 U.S.C. § 501 and Title 28, United States Code, §§ 1331 and 1338 (a). Venue is proper in this judicial district under Title 28, United States Code §§ 1400, 1391(b) and 1391(c) because, *inter alia*, defendants reside in and are subject to personal jurisdiction in this district under California's long arm statute and the Due Process Clause of the Constitution. Plaintiff's claims also arose in this district.

PLAINTIFF'S COPYRIGHTS

9. Plaintiff has complied with 17 U.S.C. § 411(a) and is the legal and beneficial owner of the copyright and related U.S. Copyright Registration No. VA 1 353 112 for the "4028 01" design of cut stone (the "'112 registration"), which was created in 2005, published on January 3, 2006 and registered on February 22, 2006, and has at all times appeared with the appropriate copyright notice. A copy of this registration is attached hereto and made a part of this Complaint as EXHIBIT A.

10. Plaintiff has complied with 17 U.S.C. § 411(a) and is the legal and beneficial owner of the copyright and related U.S. Copyright Registration No. VA 1 311 707 for the "2830 01" design of cut stone (the "'707 registration"), which was created in 2003 and registered on March 8, 2004, and has at all times appeared with the appropriate copyright notice. A copy of this registration is attached hereto and made a part of this Complaint as EXHIBIT B.

11. Plaintiff has complied with 17 U.S.C. § 411(a) and is the legal and beneficial owner of the copyright and related U.S. Copyright Registration No. VA 1 311 700 for the "3940 01" design of cut stone (the "'700 registration"), which was created in 2003, published on May 13, 2003 and registered on March 8, 2004, and has at all times appeared with the appropriate copyright notice. A copy of this registration is attached hereto and made a part of this Complaint as EXHIBIT C.

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12. Plaintiff has complied with 17 U.S.C. § 411(a) and is the legal and beneficial owner of the copyright and related U.S. Copyright Registration No. VA 1 311 699 for the "3075 01" design of cut stone (the "699 registration"), which was created in 2003, published on May 22, 2003 and registered on March 8, 2004, and has at all times appeared with the appropriate copyright notice. A copy of this registration is attached hereto and made a part of this Complaint as EXHIBIT D.

13. Plaintiff has complied with 17 U.S.C. § 411(a) and is the legal and beneficial owner of the copyright and related U.S. Copyright Registration No. VA 1 311 698 for the "2930 01" design of cut stone (the "698 registration"), which was created in 2003, published on August 1, 2003 and registered on March 8, 2004, and has at all times appeared with the appropriate copyright notice. A copy of this registration is attached hereto and made a part of this Complaint as EXHIBIT E.

14. Plaintiff has complied with 17 U.S.C. § 411(a) and is the legal and beneficial owner of the copyright and related U.S. Copyright Registration No. VA 1 299 787 for the "3205 01" design of cut stone (the "787 registration"), which was created in 2005, published on January 11, 2005 and registered on February 8, 2005, and has at all times appeared with the appropriate copyright notice. A copy of this registration is attached hereto and made a part of this Complaint as EXHIBIT F.

15. Plaintiff has complied with 17 U.S.C. § 411(a) and is the legal and beneficial owner of the copyright and related U.S. Copyright Registration No. VA 1 299 781 for the "3026 01" design of cut stone (the "781 registration"), which was created in 2005, published on January 11, 2005 and registered on February 8, 2005, and has at all times appeared with the appropriate copyright notice. A copy of this registration is attached hereto and made a part of this Complaint as EXHIBIT G.

16. Plaintiff has complied with 17 U.S.C. § 411(a) and is the legal and beneficial owner of the copyright and related U.S. Copyright Registration No. VA 1 380 758 for the "2275 01" design of cut stone (the "758 registration"), which was created in 2006, published on August 29, 2006 and registered on September 5, 2006, and has at all times appeared with the appropriate

1 copyright notice. A copy of this registration is attached hereto and made a part of this Complaint
2 as EXHIBIT H.

3 17. The HLI medallions are sold throughout the United States to residential and
4 commercial customers. Each of Plaintiff's Works have been made widely available and
5 accessible through multiple internet websites operated by plaintiff, as well as through trade
6 shows, brochures, design centers and catalogs.

7 18. Plaintiff's Works as identified above in paragraphs 9-16 inclusive, contain a
8 substantial amount of expression wholly original to Plaintiff and constitute copyrightable subject
9 matter.

10 19. Subsequent to the creation of the Works identified above, HLI is, and at all
11 relevant times has been, the owner of the copyright in the Works. HLI has also never assigned
12 the copyright in such Works to any other entity.

13 **DEFENDANT UNICORN TILE'S ACTS OF INFRINGEMENT**

14 20. Long subsequent to Plaintiff's creation of the above Works, defendant, Unicorn
15 Tile, upon information and belief, commenced the copying, display and/or distribution, in
16 commerce, of medallions titled "Verona" and "Victoria" (the "accused Unicorn Tile works")
17 which are copies identical or substantially similar to, or are unauthorized derivative works
18 substantially similar to HLI's copyrighted product Nos. 3205 01 (compare Exhibit F to Exhibit I-4
19 and I-5 "Verona") and 3026 01 (compare Exhibit G to Exhibit I-4 and I-6 "Victoria"),
20 respectively, for the purpose of displaying and selling the accused products for profit.

21 21. The accused Unicorn Tile products directly compete with HLI's product Nos. 3205
22 01 and 3026 01.

23 22. Upon information and belief, Unicorn Tile operates a website at unicorn-tiles.com,
24 which displays the Victoria and Verona medallions. Copies of Unicorn Tile's website and web
25 pages displaying the Victoria and Verona medallions are attached hereto and made a part of the
26 Complaint as EXHIBIT I.

27 23. Given the commercial purpose and nature of the Victoria and Verona medallions,
28 the copying, display, and/or distribution cannot be characterized as a credible form of "fair use."

24. Upon information and belief, Unicorn Tile has reproduced, displayed, distributed and/or sold or otherwise transferred its Victoria and Verona medallions in the United States and within in this judicial district.

25. Unless enjoined and restrained, defendant's conduct threatens to further infringe plaintiff's copyright interests.

26. Unicorn Tile is well aware and, since long prior to the acts complained of herein, has been well aware of Plaintiff's Works, which have been published and clearly marked with a copyright notice.

27. Unicorn Tile's preparation of, copying, display and/or distribution of the Unicorn Tile accused products is without license or consent of Plaintiff and constitutes copyright infringement.

28. In 2008, prior to commencing this action, Roger Souders, Vice President of HLI met Mr. Tey Shen Mai, President of Unicorn Tile at the Surfaces trade show in Las Vegas and informed him that HLI owned copyrights on several of the designs in Unicorn Tile's 2008 product catalogue.

29. On February 14, 2008, Mr. Souders sent a letter to Mr. Mai, providing notice of infringement and detailing the above the copyright infringement by the, *inter alia*, Victoria and Verona designs. A copy of the letter (without exhibits) is attached hereto and made a part of the Complaint as EXHIBIT J.

30. On March 3, 2008, Mr. Mai responded to the February 14, 2008 letter, stating that "our company is not the producer of the medallions that we carry. Our Company purchased the medallions from factories in China. Based on the fact above, we are not pulling the products from the market and we are not paying any kind of license fees." The Unicorn Tile letter is attached hereto and made a part of the Complaint as EXHIBIT K.

31. To date, Unicorn Tile has not discontinued its infringement, despite having expressly acknowledged being informed of plaintiff's copyrights.

DEFENDANT OCEAN CHARM'S ACTS OF INFRINGEMENT

32. Ocean Charm is the registrant of the domain names atmarbledesign.com and

medallionunlimited.com which, long subsequent to Plaintiff's creation of the Works, has displayed on its websites <http://medallionunlimited.com> and www.atmarbledesign.com the following medallions (the "Ocean Charm accused works") which are copies identical or substantially similar to, or are unauthorized derivative works substantially similar to plaintiff's copyrighted works as indicated:

- A. WR 705B (compare Exhibit L-5 to Exhibit A – plaintiff's "4028-01");
- B. WR 880C and MR-701 (compare Exhibit L-6 and Exhibit L-9 to Exhibit B – plaintiff's "2830-01");
- C. WS 787 (compare Exhibit L-7 to Exhibit C – plaintiff's "3940-01");
- D. MS 770 (compare Exhibit L-11 to Exhibit D – plaintiff's "3075-01");
- E. MR 712 (compare Exhibit L-10 to Exhibit E – plaintiff's "2930-01");
- F. MR 826 (compare Exhibit L-10 to Exhibit G – plaintiff's "3026 01"); and
- G. MR 827 (compare Exhibit L-10 to Exhibit H – plaintiff's "2275-01")

33. The Ocean Charm accused products directly compete with HLI's product Nos. 4028 01, 2830 01, 3940 01, 3075 01, 2930 01, 3026 01 and 2275 01. Copies of Ocean Charm's website and web pages from www.atmarbledesign.com that display its WR 705B, WR 880C and MR 701, WS 787, MS 770, MR 712, MR 826 and MR 827 medallions are attached hereto and made a part of the Complaint as collective EXHIBIT L.

34. Long after Plaintiff's creation of the Works identified above, Ocean Charm d/b/a American Tile and Marble Design, commenced the preparation of, copying, display and/or distribution, in commerce, of the Ocean Charm accused products for the purpose of displaying, distributing, and/or selling or otherwise transferring the products for profit.

35. Given the commercial purpose and nature of the WR 705B, WR 880C and MR 701, WS 787, MS 770, MR 712, MR 826 and MR 827 medallions, the preparing, copying, display, and distribution cannot be characterized as a credible form of "fair use."

36. Upon information and belief, Ocean Charm d/b/a American Tile has prepared, reproduced, displayed, distributed and/or sold or otherwise transferred its WR 705B, WR 880C and MR 701, WS 787, MS 770, MR 712, MR 826 and MR 827 medallions in the United States.

37. Unless enjoined and restrained, defendant's conduct threatens to further infringe plaintiff's copyright interests.

38. Ocean Charm is well aware and, since long prior to the acts of Ocean Charm complained of herein, has been well aware of Plaintiff's Works, which have been published and clearly marked with a copyright notice.

39. Ocean Charm's use of the Ocean Charm accused products is without license or consent of Plaintiff and constitutes copyright infringement.

COUNT I

COPYRIGHT INFRINGEMENT OF THE '112 REGISTRATION

40. Plaintiff incorporates herein each and every allegation set forth in Paragraphs 1 through 19, and 32 through 39 as if fully set forth herein.

41. All statutory conditions precedent to the institution and maintenance of the instant action have been performed or have occurred.

42. Defendant Ocean Charm has infringed, contributed to, or induced the infringement of Plaintiff's copyrighted Work Registration No. VA 1 353 112, for the "4028 01" design of cut stone, under 17 U.S.C. § 501 by preparing, making and/or reproducing, directing to be made and reproduced, assisting in making and reproducing, displaying and/or distributing Medallion No. WR 705B, which is identical to or substantially similar to the work of plaintiff's '112 registration.

43. On information and belief, Ocean Charm's aforesaid acts were deliberate, willful, and intentional violations of Plaintiff's rights for the purpose of commercial gain, and were done so knowingly without the authorization of Plaintiff and with full knowledge of Plaintiff's rights.

44. Ocean Charm's aforesaid acts have caused and will continue to cause substantial and irreparable injury to Plaintiff and damage to its ownership rights in the copyrighted work unless such acts are restrained by this Court.

45. Further irreparable harm to plaintiff is imminent as a result of Ocean Charm's conduct, and HLI is without an adequate remedy at law.

46. Plaintiff is entitled to an injunction restraining Ocean Charm, its officers, directors, agents, employees, representatives and all persons acting in concert with them from engaging in

1 further such acts of copyright infringement and to an impounding and disposition of all remaining
2 infringing medallions under defendant's control or possession.

3 47. Plaintiff is further entitled to recover from Ocean Charm the damages sustained by
4 Plaintiff as a result of Ocean Charm's acts of copyright infringement.

5 48. Plaintiff is further entitled to an accounting and to recover from Ocean Charm the
6 gains, profits and advantages it has obtained as a result of its acts of copyright infringement.

7 49. Plaintiff is alternatively further entitled to recover statutory damages under 17
8 U.S.C. § 504 for violation of its registered copyright.

9 50. Plaintiff is further entitled to an award of its "full costs" and its reasonable
10 attorney's fees.

11 COUNT II

12 COPYRIGHT INFRINGEMENT OF THE '707 REGISTRATION

13 51. Plaintiff incorporates herein each and every allegation set forth in Paragraphs 1
14 through 19, and 32 through 50 as if fully set forth herein.

15 52. All statutory conditions precedent to the institution and maintenance of the instant
16 action have been performed or have occurred.

17 53. Defendant Ocean Charm has infringed, contributed to, or induced the infringement
18 of Plaintiff's copyrighted Work Registration No. VA 1 311 707, for the "2830 01" design of cut
19 stone, under 17 U.S.C. § 501 by preparing, making and/or reproducing, directing to be made and
20 reproduced, assisting in making and reproducing, displaying and/or distributing Medallion Nos.
21 WR 880C and MR 701, which are identical to or substantially similar to the work of the '707
22 registration.

23 54. On information and belief, Ocean Charm's aforesaid acts were deliberate, willful,
24 and intentional violations of Plaintiff's rights for the purpose of commercial gain, and were done
25 so knowingly without the authorization of Plaintiff and with full knowledge of Plaintiff's rights.

26 55. Ocean Charm's aforesaid acts have caused and will continue to cause substantial
27 and irreparable injury to Plaintiff and damage to its ownership rights in the copyrighted work
28 unless such acts are restrained by this Court.

1 56. Further irreparable harm to plaintiff is imminent as a result of Ocean Charm's
2 conduct, and HLI is without an adequate remedy at law.

3 57. Plaintiff is entitled to an injunction restraining Ocean Charm, its officers, directors,
4 agents, employees, representatives and all persons acting in concert with them from engaging in
5 further such acts of copyright infringement and to an impounding and disposition of all remaining
6 infringing medallions under defendant's control or possession.

7 58. Plaintiff is further entitled to recover from Ocean Charm the damages sustained by
8 Plaintiff as a result of Ocean Charm's acts of copyright infringement.

9 59. Plaintiff is further entitled to an accounting and to recover from Ocean Charm the
10 gains, profits and advantages it has obtained as a result of its acts of copyright infringement.

11 60. Plaintiff is alternatively further entitled to recover statutory damages under 17
12 U.S.C. § 504 for violation of its registered copyright.

13 61. Plaintiff is further entitled to an award of its "full costs" and its reasonable
14 attorney's fees.

15 **COUNT III**

16 **COPYRIGHT INFRINGEMENT OF THE '700 REGISTRATION**

17 62. Plaintiff incorporates herein each and every allegation set forth in Paragraphs 1
18 through 19, and 32 through 61 as if fully set forth herein.

19 63. All statutory conditions precedent to the institution and maintenance of the instant
20 action have been performed or have occurred.

21 64. Defendant Ocean Charm has infringed, contributed to, or induced the infringement
22 of Plaintiff's copyrighted Work Registration No. VA 1 311 700, for the "3940 01" design of cut
23 stone, under 17 U.S.C. § 501 by preparing, making and/or reproducing, directing to be made and
24 reproduced, assisting in making and reproducing, displaying and/or distributing Medallion No.
25 WS 787, which is identical to or substantially similar to the work of the '700 Registration.

26 65. On information and belief, Ocean Charm's aforesaid acts were deliberate, willful,
27 and intentional violations of Plaintiff's rights for the purpose of commercial gain, and were done
28 so knowingly without the authorization of Plaintiff and with full knowledge of Plaintiff's rights.

1 66. Ocean Charm's aforesaid acts have caused and will continue to cause substantial
2 and irreparable injury to Plaintiff and damage to its ownership rights in the copyrighted work
3 unless such acts are restrained by this Court.

4 67. Further irreparable harm to plaintiff is imminent as a result of Ocean Charm's
5 conduct, and HLI is without an adequate remedy at law.

6 68. Plaintiff is entitled to an injunction restraining Ocean Charm, its officers, directors,
7 agents, employees, representatives and all persons acting in concert with them from engaging in
8 further such acts of copyright infringement and to an impounding and disposition of all remaining
9 infringing medallions under defendant's control or possession.

10 69. Plaintiff is further entitled to recover from Ocean Charm the damages sustained by
11 Plaintiff as a result of Ocean Charm's acts of copyright infringement.

12 70. Plaintiff is further entitled to an accounting and to recover from Ocean Charm the
13 gains, profits and advantages it has obtained as a result of its acts of copyright infringement.

14 71. Plaintiff is alternatively further entitled to recover statutory damages under 17
15 U.S.C. § 504 for violation of its registered copyright.

16 72. Plaintiff is further entitled to an award of its "full costs" and its reasonable
17 attorney's fees.

18 **COUNT IV**

19 **COPYRIGHT INFRINGEMENT OF THE '699 REGISTRATION**

20 73. Plaintiff incorporates herein each and every allegation set forth in Paragraphs 1
21 through 19, and 32 through 72 as if fully set forth herein.

22 74. All statutory conditions precedent to the institution and maintenance of the instant
23 action have been performed or have occurred.

24 75. Defendant Ocean Charm has infringed, contributed to, or induced the infringement
25 of Plaintiff's copyrighted Work Registration No. VA 1 311 699, for the "3075 01" design of cut
26 stone, under 17 U.S.C. § 501 by preparing, making and/or reproducing, directing to be made and
27 reproduced, assisting in making and reproducing, displaying and/or distributing Medallion No.
28 MS 770, which is identical to or substantially similar to the work of the '699 registration.

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1 stone, under 17 U.S.C. § 501 by preparing, making and/or reproducing, directing to be made and
2 reproduced, assisting in making and reproducing, displaying and/or distributing the Medallion
3 No. MR 712, which is identical to or substantially similar to the work of the '698 Registration.

4 87. On information and belief, Ocean Charm's aforesaid acts were deliberate, willful,
5 and intentional violations of Plaintiff's rights for the purpose of commercial gain, and were done
6 so knowingly without the authorization of Plaintiff and with full knowledge of Plaintiff's rights.

7 88. Ocean Charm's aforesaid acts have caused and will continue to cause substantial
8 and irreparable injury to Plaintiff and damage to its ownership rights in the copyrighted work
9 unless such acts are restrained by this Court.

10 89. Further irreparable harm to plaintiff is imminent as a result of Ocean Charm's
11 conduct, and HLI is without an adequate remedy at law.

12 90. Plaintiff is entitled to an injunction restraining Ocean Charm, its officers, directors,
13 agents, employees, representatives and all persons acting in concert with them from engaging in
14 further such acts of copyright infringement and to an impounding and disposition of all remaining
15 infringing medallions under defendant's control or possession.

16 91. Plaintiff is further entitled to recover from Ocean Charm the damages sustained by
17 Plaintiff as a result of Ocean Charm's acts of copyright infringement.

18 92. Plaintiff is further entitled to an accounting and to recover from Ocean Charm the
19 gains, profits and advantages it has obtained as a result of its acts of copyright infringement.

20 93. Plaintiff is alternatively further entitled to recover statutory damages under 17
21 U.S.C. § 504 for violation of its registered copyright.

22 94. Plaintiff is further entitled to an award of its "full costs" and its reasonable
23 attorney's fees.

24 COUNT VI

25 COPYRIGHT INFRINGEMENT OF THE '781 REGISTRATION

26 95. Plaintiff incorporates herein each and every allegation set forth in Paragraphs 1
27 through 19, and 32 through 94 as if fully set forth herein.

28 96. All statutory conditions precedent to the institution and maintenance of the instant

1 action have been performed or have occurred.

2 97. Defendant Ocean Charm has infringed, contributed to, or induced the infringement
3 of Plaintiff's copyrighted Work Registration No. VA 1 299 781, for the "3026 01" design of cut
4 stone, under 17 U.S.C. § 501 by preparing, making and/or reproducing, directing to be made and
5 reproduced, assisting in making and reproducing, displaying and/or distributing the Ocean Charm
6 No. MR 826 medallion, which is identical to or substantially similar to the work of the '781
7 Registration.

8 98. On information and belief, Ocean Charm's aforesaid acts were deliberate, willful,
9 and intentional violations of Plaintiff's rights for the purpose of commercial gain, and were done
10 so knowingly without the authorization of Plaintiff and with full knowledge of Plaintiff's rights.

11 99. Ocean Charm's aforesaid acts have caused and will continue to cause substantial
12 and irreparable injury to Plaintiff and damage to its ownership rights in the copyrighted work
13 unless such acts are restrained by this Court.

14 100. Further irreparable harm to plaintiff is imminent as a result of Ocean Charm's
15 conduct, and Plaintiff is without an adequate remedy at law.

16 101. Plaintiff is entitled to an injunction restraining Unicorn Tile, its officers, directors,
17 agents, employees, representatives and all persons acting in concert with them from engaging in
18 further such acts of copyright infringement and to an impounding and disposition of all remaining
19 infringing medallions under defendant's control or possession.

20 102. Plaintiff is further entitled to recover from Ocean Charm the damages sustained by
21 Plaintiff as a result of Ocean Charm's acts of copyright infringement.

22 103. Plaintiff is further entitled to an accounting and to recover from Ocean Charm the
23 gains, profits and advantages it has obtained as a result of its acts of copyright infringement.

24 104. Plaintiff is alternatively further entitled to recover statutory damages under 17
25 U.S.C. § 504 for violation of its registered copyright.

26 105. Plaintiff is further entitled to an award of its "full costs" and its reasonable
27 attorney's fees.

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COUNT VII

COPYRIGHT INFRINGEMENT OF THE '758 REGISTRATION

106. Plaintiff incorporates herein each and every allegation set forth in Paragraphs 1 through 19, and 32 through 105 as if fully set forth herein.

107. All statutory conditions precedent to the institution and maintenance of the instant action have been performed or have occurred.

108. Defendant Ocean Charm has infringed, contributed to, or induced the infringement of Plaintiff's copyrighted Work Registration No. VA 1 380 758, for the "2275 01" design of cut stone, under 17 U.S.C. § 501 by preparing, making and/or reproducing, directing to be made and reproduced, assisting in making and reproducing, displaying and/or distributing the Medallion No. MR 827, which is identical to or substantially similar to the work of the '758 Registration.

109. On information and belief, Ocean Charm's aforesaid acts were deliberate, willful, and intentional violations of Plaintiff's rights for the purpose of commercial gain, and were done so knowingly without the authorization of Plaintiff and with full knowledge of Plaintiff's rights.

110. Ocean Charm's aforesaid acts have caused and will continue to cause substantial and irreparable injury to Plaintiff and damage to its ownership rights in the copyrighted work unless such acts are restrained by this Court.

111. Further irreparable harm to plaintiff is imminent as a result of Ocean Charm's conduct, and HLI is without an adequate remedy at law.

112. Plaintiff is entitled to an injunction restraining Ocean Charm, its officers, directors, agents, employees, representatives and all persons acting in concert with them from engaging in further such acts of copyright infringement and to an impounding and disposition of all remaining infringing medallions under defendant's control or possession.

113. Plaintiff is further entitled to recover from Ocean Charm the damages sustained by Plaintiff as a result of Ocean Charm's acts of copyright infringement.

114. Plaintiff is further entitled to an accounting and to recover from Ocean Charm the gains, profits and advantages it has obtained as a result of its acts of copyright infringement.

115. Plaintiff is alternatively further entitled to recover statutory damages under 17

1 U.S.C. § 504 for violation of its registered copyright.

2 116. Plaintiff is further entitled to an award of its "full costs" and its reasonable
3 attorney's fees.

4 **COUNT VIII**

5 **COPYRIGHT INFRINGEMENT OF THE '787 REGISTRATION**

6 117. Plaintiff incorporates herein each and every allegation set forth in Paragraphs 1
7 through 31 as if fully set forth herein.

8 118. All statutory conditions precedent to the institution and maintenance of the instant
9 action have been performed or have occurred.

10 119. Defendant Unicorn Tile has infringed, contributed to, or induced the infringement
11 of Plaintiff's copyrighted Work Registration No. VA 1 299 787, for the "3205 01" design of cut
12 stone, under 17 U.S.C. § 501 by preparing, making and/or reproducing, directing to be made and
13 reproduced, assisting in making and reproducing, displaying and/or distributing the Verona
14 medallion, which is identical to or substantially similar to the work of the '787 Registration.

15 120. On information and belief, Unicorn Tile's aforesaid acts were deliberate, willful,
16 and intentional violations of Plaintiff's rights for the purpose of commercial gain, and were done
17 so knowingly without the authorization of Plaintiff and with full knowledge of Plaintiff's rights.

18 121. Unicorn Tile's aforesaid acts have caused and will continue to cause substantial
19 and irreparable injury to Plaintiff and damage to its ownership rights in the copyrighted work
20 unless such acts are restrained by this Court.

21 122. Further irreparable harm to plaintiff is imminent as a result of Unicorn Tile's
22 conduct, and HLI is without an adequate remedy at law.

23 123. Plaintiff is entitled to an injunction restraining Unicorn Tile, its officers, directors,
24 agents, employees, representatives and all persons acting in concert with them from engaging in
25 further such acts of copyright infringement and to an impounding and disposition of all remaining
26 infringing medallions under defendant's control or possession.

27 124. Plaintiff is further entitled to recover from Unicorn Tile the damages sustained by
28 Plaintiff as a result of Unicorn Tile's acts of copyright infringement.

1 125. Plaintiff is further entitled to an accounting and to recover from Ocean Charm the
2 gains, profits and advantages it has obtained as a result of its acts of copyright infringement.

3 126. Plaintiff is alternatively further entitled to recover statutory damages under 17
4 U.S.C. § 504 for violation of its registered copyright.

5 127. Plaintiff is further entitled to an award of its "full costs" and its reasonable
6 attorney's fees.

7 **COUNT IX**

8 **COPYRIGHT INFRINGEMENT OF THE '781 REGISTRATION**

9 128. Plaintiff incorporates herein each and every allegation set forth in Paragraphs 1
10 through 31, and 117 through 127 as if fully set forth herein.

11 129. All statutory conditions precedent to the institution and maintenance of the instant
12 action have been performed or have occurred.

13 130. Defendant Unicorn Tile has infringed, contributed to, or induced the infringement
14 of Plaintiff's copyrighted Work Registration No. VA 1 299 781, for the "3026 01" design of cut
15 stone, under 17 U.S.C. § 501 by preparing, making and/or reproducing, directing to be made and
16 reproduced, assisting in making and reproducing, displaying and/or distributing the Victoria
17 medallion, which is identical to or substantially similar to the work of the '781 Registration.

18 131. On information and belief, Unicorn Tile's aforesaid acts were deliberate, willful,
19 and intentional violations of Plaintiff's rights for the purpose of commercial gain, and were done
20 so knowingly without the authorization of Plaintiff and with full knowledge of Plaintiff's rights.

21 132. Unicorn Tile's aforesaid acts have caused and will continue to cause substantial
22 and irreparable injury to Plaintiff and damage to its ownership rights in the copyrighted work
23 unless such acts are restrained by this Court.

24 133. Further irreparable harm to plaintiff is imminent as a result of Unicorn Tile's
25 conduct, and Plaintiff is without an adequate remedy at law.

26 134. Plaintiff is entitled to an injunction restraining Unicorn Tile, its officers, directors,
27 agents, employees, representatives and all persons acting in concert with them from engaging in
28 further such acts of copyright infringement and to an impounding and disposition of all remaining

1 infringing medallions under defendant's control or possession.

2 135. Plaintiff is further entitled to recover from Unicorn Tile the damages sustained by
3 Plaintiff as a result of Unicorn Tile's acts of copyright infringement.

4 136. Plaintiff is further entitled to an accounting and to recover from Ocean Charm the
5 gains, profits and advantages it has obtained as a result of its acts of copyright infringement.

6 137. Plaintiff is alternatively further entitled to recover statutory damages under 17
7 U.S.C. § 504 for violation of its registered copyright.

8 138. Plaintiff is further entitled to an award of its "full costs" and its reasonable
9 attorney's fees.

10 **PRAYER**

11 WHEREFORE, Plaintiff HLI prays:

12 (a) That this Court will adjudge that the copyright in and to the aforesaid copyrighted
13 works, U.S. Copyright Regis. Nos. VA 1 353 112, VA 1 311 707, VA 1 311 700, VA 1 311 699,
14 VA 1 311 698, VA 1 299 787, VA 1 299 781 and VA 1 380 758, have been infringed as a direct
15 and proximate result of the acts of Defendants as set forth in this Complaint, in violation of
16 Plaintiff's rights under the Copyright Act of 1976, 17 U.S.C. § 101 et seq.;

17 (b) For a preliminary and permanent injunction enjoining and restraining Defendants
18 and all officers, directors, agents, servants, employees, affiliates, attorneys, successors, and
19 assigns, and all persons acting in active concert or participation therewith from infringing
20 Plaintiff's copyrights in any manner, and from reproducing, displaying, exhibiting, distributing or
21 otherwise using or disposing of any materials which in whole or in part is copied from Plaintiff's
22 copyrighted works;

23 (c) That Defendants each be required to deliver up for destruction all goods, sketches,
24 signs, brochures, prints, packages, wrappers, receptacles, advertisements, and other written or
25 printed materials that bear the copyrighted works or any design similar thereto;

26 (d) That Defendants each account for and Plaintiff recover Defendants' profits and the
27 damages of Plaintiff arising from Defendants' acts involving copyright infringement, or
28 alternatively at Plaintiff's election, an award of statutory damages as provided by 17 U.S.C. §

1 504(c);

2 (e) That Plaintiff recover both prejudgment and post judgment interest on each and
3 every award;

4 (f) That Plaintiff recover increased statutory damages under 17 U.S.C. § 504, because
5 the infringements were committed willfully;

6 (g) That Plaintiff recover pursuant to 17 U.S.C. § 505 its reasonable attorneys' fees
7 incurred in this action;

8 (h) That Plaintiff have and recover its full costs incurred in this action; and

9 (i) That Plaintiff have other and such further relief as the Court deems just and proper.

10 **JURY DEMAND**

11 Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure and the 7th Amendment to
12 the Constitution of the United States, plaintiff demands a trial by jury of all issues triable as of
13 right by jury in the above action.

14 DATED: June 5, 2008

DUCKOR SPRADLING METZGER & WYNNE
A Law Corporation

15
16
17 By: 

DOUGLAS W. LYTLE
Attorneys for Plaintiff
HONOR LIFE, INC.

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COMPLAINT

EXHIBIT "A"

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America



Form VA

For a Work of the Visual Arts

VA 1-353-112



EFFECTIVE DATE OF REGISTRATION

Feb 22 2006
Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1

Title of This Work ▼

NATURE OF THIS WORK ▼ See Instructions

4028-01

Design of cut stone

Previous or Alternative Titles ▼

Publication as a Contribution If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼

Number ▼

Issue Date ▼

On Pages ▼

2

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

NAME OF AUTHOR ▼

a Honor Life, Inc.

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"? ☒ Yes ☐ No

Author's Nationality or Domicile
Name of Country

OR Citizen of USA
Domiciled in USA

Was This Author's Contribution to the Work:

Anonymous? ☐ Yes ☒ No
Pseudonymous? ☐ Yes ☒ No

If the answer to either of these questions is "Yes," see detailed instructions.

Nature of Authorship Check appropriate box(es). See Instructions

- ☐ 3-Dimensional sculpture ☐ Map ☐ Technical drawing
☒ 2-Dimensional artwork ☐ Photograph ☐ Text
☐ Reproduction of work of art ☐ Jewelry design ☐ Architectural work

Name of Author ▼

Dates of Birth and Death
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"? ☐ Yes ☐ No

Author's Nationality or Domicile
Name of Country

OR Citizen of
Domiciled in

Was This Author's Contribution to the Work:

Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions.

Nature of Authorship Check appropriate box(es). See Instructions

- ☐ 3-Dimensional sculpture ☐ Map ☐ Technical drawing
☐ 2-Dimensional artwork ☐ Photograph ☐ Text
☐ Reproduction of work of art ☐ Jewelry design ☐ Architectural work

3

Year in Which Creation of This Work Was Completed

2005

This information must be given Year in all cases.

Date and Nation of First Publication of This Particular Work

Complete this information ONLY if this work has been published.

Month Day Year 3 2006

Nation

4

See instructions before completing this space.

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

Honor Life, Inc.
955 Park Center Drive
Vista, CA 92081

Transfer If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED

FEB 22 2006

ONE DEPOSIT RECEIVED

FEB 22 2006

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

MORE ON BACK ►

• Complete all applicable spaces (numbers 5-8) on the reverse side of this page.
• See detailed instructions. • Sign the form at line 8.

DO NOT WRITE HERE
Page 1 of 2 pages

EXHIBIT A
PAGE 1

EXAMINED BY	<i>HBM</i>	FORM VA
CHECKED BY	<i>HW</i>	
<input type="checkbox"/> CORRESPONDENCE		FOR
Yes		COPYRIGHT
		OFFICE
		USE
		ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☒ No If your answer is "Yes," why is another registration being sought? (Check appropriate box.) ▼a. ☐ This is the first published edition of a work previously registered in unpublished form.b. ☐ This is the first application submitted by this author or copyright claimant.c. ☐ This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ▼

Year of Registration ▼

5

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

6

a
See instructions
before completing
this space.

b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

b

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.
Name ▼ Account Number ▼

7

a

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP ▼

Roderick J. Geis
Honor Life, Inc.
955 Park Center Drive
Vista, CA 92081

b

Area code and daytime telephone number (760) 727-8561

Fax number (760) 727-2451

Email rgeis@honorlife.com

CERTIFICATION* I, the undersigned, hereby certify that I am the

check only one →

- ☐ author
- ☐ other copyright claimant
- ☐ owner of exclusive right(s)
- ☒ authorized agent of Honor Life, Inc.

Name of author or other copyright claimant, or owner of exclusive right(s)

8

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

Roderick J. Geis

Date 02/13/2006

Handwritten signature (X) ▼

X

Certificate
will be
mailed in
window
envelope
to this
address:

Name ▼
Honor Life, Inc.

Number/Street/Apt ▼
955 Park Center Drive

City/State/ZIP ▼
Vista, CA 92081

YOU MUST:

- Complete all necessary spaces
- Sign your application in space 8

SEND ALL ELEMENTS IN THE SAME PACKAGE:

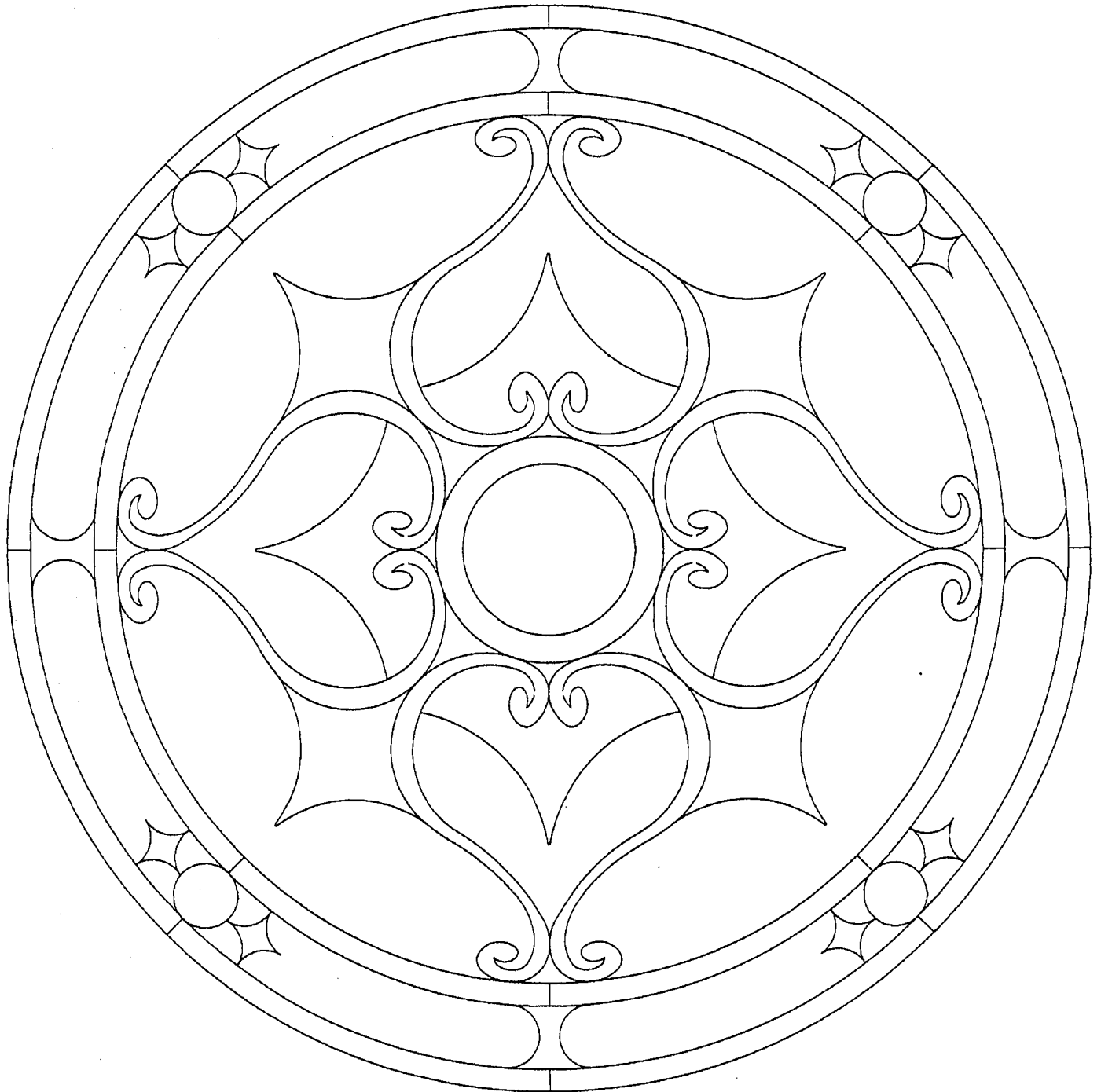
1. Application form
2. Nonrefundable filing fee in check or money order payable to Registrar of Copyrights
3. Deposit material

MAIL TO:

Library of Congress
Copyright Office
101 Independence Avenue, S.E.
Washington, D.C. 20559-6000

9

*17 U.S.C. § 506(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 408, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.



Honor Life Medallion #4028-01

COMPLAINT

EXHIBIT "B"

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Form VA
For a Work of the Visual Arts
UNITED STATES COPYRIGHT OFFICE

REC VA 1-311-707



EFFECTIVE DATE OF REGISTRATION

MARCH 8 2004
Month Day Year

DO NOT WRITE ABOVE THIS LINE IF YOU NEED MORE SPACE USE A SEPARATE CONTINUATION SHEET

1

Title of This Work ▼

2830 01

NATURE OF THIS WORK ▼ See instructions

Design of cut stone

Previous or Alternative Titles ▼

Publication as a Contribution If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

2

NOTE

Under the law the author of a work made for hire is generally the employer, not the employee (see instructions). For any part of this work that was made for hire check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as Author of that part and leave the space for dates of birth and death blank.

NAME OF AUTHOR ▼

a Honor Life Inc

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"?

☒ Yes
☐ No

Author's Nationality or Domicile

Name of Country
OR Country of USA
Domiciled in USA

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☒ No
Pseudonymous? ☐ Yes ☒ No
If the answer to either of these questions is "Yes" see detailed instructions.

Nature of Authorship Check appropriate box(es) See instructions

☐ 3 Dimensional sculpture ☐ Map ☐ Technical drawing
☒ 2 Dimensional artwork ☐ Photograph ☐ Text
☐ Reproduction of work of art ☐ Jewelry design ☐ Architectural work

Name of Author ▼

b

Dates of Birth and Death

Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"?

☐ Yes
☐ No

Author's Nationality or Domicile

Name of Country
OR Country of _____
Domiciled in _____

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No
If the answer to either of these questions is "Yes" see detailed instructions.

Nature of Authorship Check appropriate box(es) See instructions

☐ 3 Dimensional sculpture ☐ Map ☐ Technical drawing
☐ 2 Dimensional artwork ☐ Photograph ☐ Text
☐ Reproduction of work of art ☐ Jewelry design ☐ Architectural work

3

Year to Which Creation of This Work Was

Completed 2003

This information must be given in all cases

Date and Nation of First Publication of This Particular Work

Complete this information ONLY if this work has been published Month 8 Day 13 Year 2002
USA

Nation

4

See instructions before completing this space

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author as on space 2 ▼

Honor Life Inc
955 Park Center Drive
Vista, CA 92081

Transfer If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright ▼

APPLICATION RECEIVED

3-8-04 7-25-05

ONE DEPOSIT RECEIVED

3-8-04 7-25-05

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

MORE ON BACK ►

Complete all applicable spaces (numbers 3-4) on the reverse side of this page
See detailed instructions Sign the form at line 8

DO NOT WRITE HERE
Page 1 of 2 pages

EXHIBIT B
PAGE 4

EXAMINED BY DW

FORM VA

CHECKED BY

☒ CORRESPONDENCE
YesFOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE IF YOU NEED MORE SPACE USE A SEPARATE CONTINUATION SHEET

PREVIOUS REGISTRATION Has registration for this work or for an earlier version of this work already been made in the Copyright Office?

☐ Yes ☒ No If your answer is "Yes" why is another registration being sought? (Check appropriate box) ▼a ☐ This is the first published edition of a work previously registered in unpublished formb ☐ This is the first application submitted by this author as copyright claimantc ☐ This is a changed version of the work as shown by space 6 on this application

If your answer is "Yes" give Previous Registration Number ▼

Year of Registration ▼

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work complete only 6b for a compilation

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates ▼

Antique classical design

a **6**
See instructions
before completing
this space

b. Material Added to This Work Give a brief general statement of the material that has been added to this work and in which copyright is claimed ▼

Adaptation of design plus additional artwork and modification of design to format of cut stone medallion

b

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office give name and number of Account
Name ▼ Account Number ▼a **7**

CORRESPONDENCE Give name and address to which correspondence about this application should be sent: Name/Address/Apt/City/State/ZIP ▼

Roderick J Geis
Honor Life Inc.
955 Park Center Drive
Vista, CA 92081

Area code and daytime telephone number (760) 727 8561

Fax number (760) 727 2451

Email: rgeis@honorlife.com

b

CERTIFICATION* I, the undersigned, hereby certify that I am the

check only one ►

- ☐ author
☐ other copyright claimant
☐ owner of exclusive right(s)
☒ authorized agent of Honor Life Inc

Name of author or other copyright claimant, or owner of exclusive right(s) A

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge

Typed or printed name and date ▼ If this application gives a date of publication in space 3 do not sign and submit it before that date

Roderick J Geis

Date 03/17/2004

Handwritten signature (X) ▼

X

Certificate
will be
mailed in
window
envelope
to this
address

Name ▼

Honor Life Inc.

Number/Street/Apt ▼

955 Park Center Drive

City/State/ZIP ▼

Vista, CA 92081

Complete all necessary spaces
Sign your application in space 81. Application form
2. Nonrefundable filing fee in check or money
order payable to Register of Copyrights
3. Deposit materialLibrary of Congress
Copyright Office
101 Independence Avenue S.E.
Washington D.C. 20559-0000Have fee related to
charge for search
been cleared the
Copyright Office
includes a
check copyright fee
with the Copyright
Office or call
(800) 777-6688

17 U.S.C. § 506(a) Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 405 or in any written statement filed in connection with the application shall be fined not more than \$2,500



Honor Life Medallion #2830-01

COMPLAINT

EXHIBIT "C"

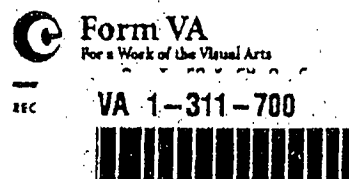
Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America



EFFECTIVE DATE OF REGISTRATION

March 8 2004
Month Day Year

DO NOT WRITE ABOVE THIS LINE IF YOU NEED MORE SPACE USE A SEPARATE CONTINUATION SHEET

1

Title of This Work ▼

3940 01

NATURE OF THIS WORK ▼ See instructions

Design of cut stone

Previous or Alternative Titles ▼

Publication as a Contribution If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give Volume ▼

Number ▼

Issue Date ▼

On Pages ▼

2

NOTE

Under the law the author of a work made for hire is generally the employer, not the employee (see instructions). For any part of this work that was made for hire check "Yes" in the space provided give the employer (or other person for whom the work was prepared) as Author of that part and leave the space for dates of birth and death blank.

NAME OF AUTHOR ▼

a Honor Life Inc

DATES OF BIRTH AND DEATH

Year Born ▼

Year Died ▼

Was this contribution to the work a "work made for hire"? ☒ Yes ☐ No

Author's Nationality or Domicile

Name of Country

OR { Citizen of USA
Domiciled in USA

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☒ No

Pseudonymous? ☐ Yes ☒ No

If the answer to either of these questions is "Yes" see detailed instructions

Nature of Authorship Check appropriate box(es) See instructions

☐ 3 Dimensional sculpture

☐ Map

☐ Technical drawing

☒ 2 Dimensional artwork

☐ Photograph

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

Name of Author ▼

b

Dates of Birth and Death

Year Born ▼

Year Died ▼

Was this contribution to the work a "work made for hire"? ☐ Yes ☐ No

Author's Nationality or Domicile

Name of Country

OR { Citizen of
Domiciled in

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☐ No

Pseudonymous? ☐ Yes ☐ No

If the answer to either of these questions is "Yes" see detailed instructions

Nature of Authorship Check appropriate box(es) See instructions

☐ 3 Dimensional sculpture

☐ Map

☐ Technical drawing

☐ 2 Dimensional artwork

☐ Photograph

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

3

a

Year in Which Creation of This Work Was Completed

2003

This information must be given in all cases

Date and Nation of First Publication of This Particular Work

Complete this information ONLY if this work has been published

Month 5

Day 13

Year 2003

Nation

4

See instructions before completing this space

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2 ▼

Honor Life Inc
955 Park Center Drive
Vista, CA 92081

Transfer If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2 give a brief statement of how the claimant(s) obtained ownership of the copyright ▼

DO NOT WRITE HERE OFFICE USE ONLY

APPLICATION RECEIVED
March 8, 2004 7-25-05
ONE DEPOSIT RECEIVED
March 8, 2004 7-25-05
TWO DEPOSITS RECEIVED

FUNDS RECEIVED

MORE ON BACK ►

Complete all applicable spaces (numbers 5-9) on the reverse side of this page. See detailed instructions. Sign the form at line 8.

DO NOT WRITE HERE

Page 1 of 2 pages

EXHIBIT C
PAGE 7

EXAMINED BY DW

FORM VA

CHECKED BY

☒ CORRESPONDENCE
YesFOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE IF YOU NEED MORE SPACE USE A SEPARATE CONTINUATION SHEET

PREVIOUS REGISTRATION Has registration for this work or for an earlier version of this work already been made in the Copyright Office?

☐ Yes ☒ No If your answer is Yes why is another registration being sought? (Check appropriate box) ▼a ☐ This is the first published edition of a work previously registered in unpublished formb ☐ This is the first application submitted by this author as copyright claimantc ☐ This is a changed version of the work as shown by space 6 on this application

If your answer is Yes give Previous Registration Number ▼

Year of Registration ▼

5

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work complete only 6b for a compilation

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates ▼

Antique classical design

6
a See instructions
before completing
this space

b Material Added to This Work Give a brief general statement of the material that has been added to this work and in which copyright is claimed ▼

Adaptation of design plus additional artwork and modification of design to format of cut stone medallion

b

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office give name and number of Account
Name ▼ Account Number ▼

a

7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent Name/Address/Apt/City/State/ZIP ▼

Roderick J. Geis
Honor Life Inc
955 Park Center Drive
Vista CA 92081

Area code and daytime telephone number (760) 727 8561

Fax number (760) 727 2451

Email rgeis@honorlife.com

b

CERTIFICATION* I the undersigned hereby certify that I am the

check only one ► ☐ author
☐ other copyright claimant
☐ owner of exclusive right(s)
☒ authorized agent of Honor Life Inc

Name of author or other copyright claimant, or owner of exclusive right(s) &

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge

8

Typed or printed name and date ▼ If this application gives a date of publication in space 3 do not sign and submit it before that date

Roderick J Geis

Date 03/17/2004

Handwritten signature (or X)

X

Certificate
will be
mailed in
window
envelope
to this
address

Name ▼

Honor Life Inc.

Number/Street/Apt ▼

955 Park Center Drive

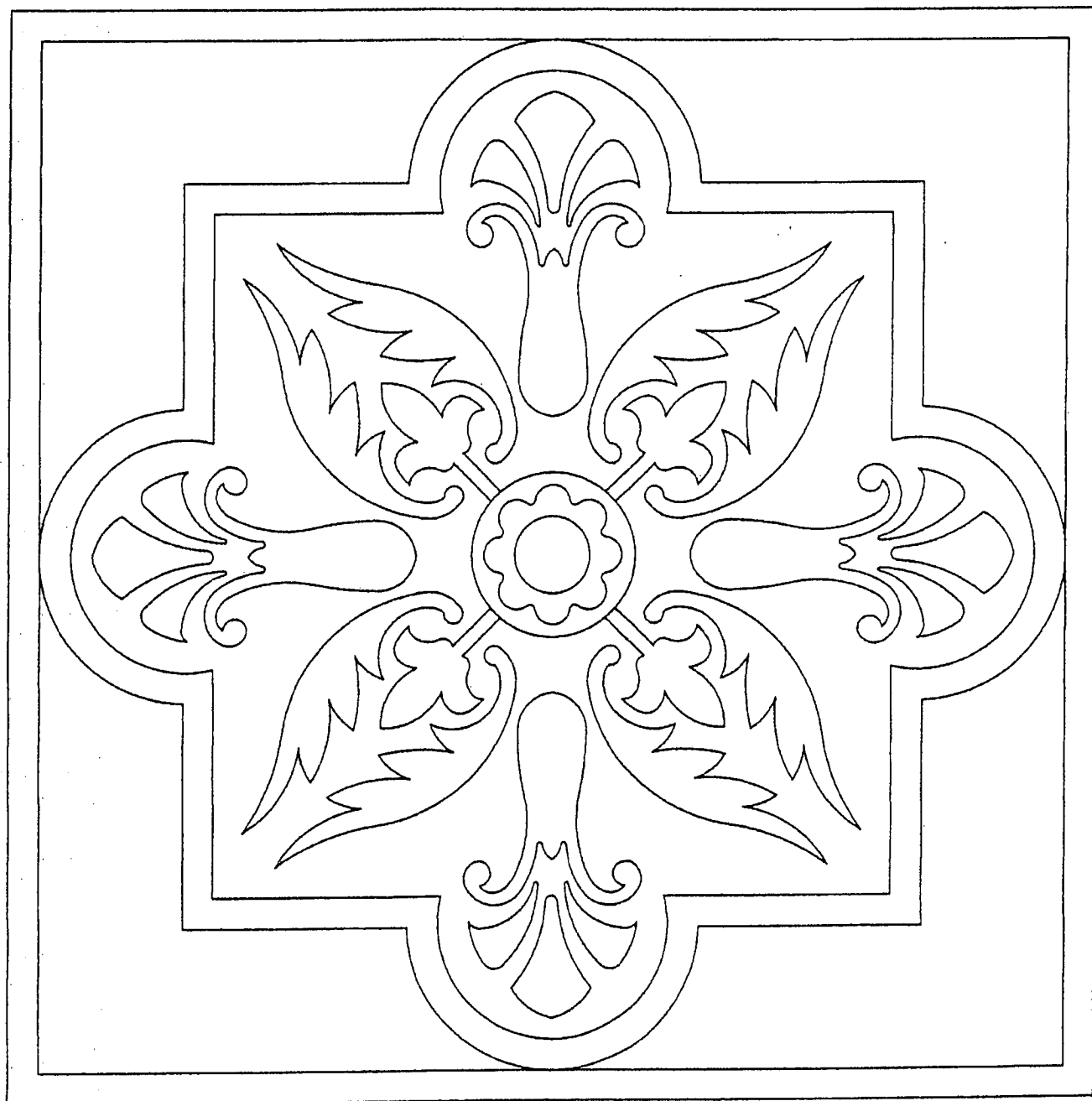
City/State/ZIP ▼

Vista CA 92081

Complete all necessary spaces
Sign your application in space 8.1. Application form
2. Nonrefundable filing fee in check or money
order payable to Registrar of Copyrights
3. Deposit material
Library of Congress
Copyright Office
101 Independence Avenue S.E.
Washington D.C. 20540-4000Fees are subject to
change. For current
fees, consult the
Copyright Office
website at
www.copyright.gov
or call the Copyright
Office at toll
(800) 775-5888

9

17 U.S.C. § 508(e) Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409 or in any written statement filed in connection with the application shall be fined not more than \$2,500.

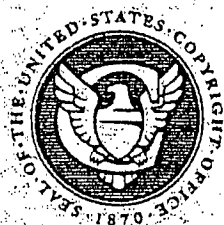


Honor Life Medallion #3940-01

COMPLAINT

EXHIBIT "D"

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Form VA
For a Work of the Visual Arts

VA 1-311-699



EFFECTIVE DATE OF REGISTRATION

March 8 2004
Month Day Year

DO NOT WRITE ABOVE THIS LINE IF YOU NEED MORE SPACE USE A SEPARATE CONTINUATION SHEET

1

Title of This Work ▼

3075 01

NATURE OF THIS WORK ▼ See instructions

Design of cut stone

Previous or Alternative Titles ▼

Publication as a Contribution If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

2

NOTE

Under the law the author of a work made for hire, is generally the employer, not the employee. (see instructions) For any part of this work that was made for hire check "Yes" in the space provided give the employer (or other person for whom the work was prepared) as Author of that part and leave the space for dates of birth and death blank.

NAME OF AUTHOR ▼

a Honor Life Inc

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a work made for hire?

☒ Yes
☐ No

Author's Nationality or Domicile
Name of Country

OR { Citizen of USA
Domiciled in USA

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☒ No

Pseudonym? ☐ Yes ☒ No

If the answer to either of these questions is "Yes" see detailed instructions

Nature of Authorship Check appropriate box(es) See instructions

☐ 3 Dimensional sculpture ☐ Map ☐ Technical drawing
☒ 2 Dimensional artwork ☐ Photograph ☐ Text
☐ Reproduction of work of art ☐ Jewelry design ☐ Architectural work

Name of Author ▼

Dates of Birth and Death
Year Born ▼ Year Died ▼

Was this contribution to the work a work made for hire?

☐ Yes
☐ No

Author's Nationality or Domicile
Name of Country

OR { Citizen of
Domiciled in

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☐ No

Pseudonym? ☐ Yes ☐ No

If the answer to either of these questions is "Yes" see detailed instructions

Nature of Authorship Check appropriate box(es) See instructions

☐ 3 Dimensional sculpture ☐ Map ☐ Technical drawing
☐ 2 Dimensional artwork ☐ Photograph ☐ Text
☐ Reproduction of work of art ☐ Jewelry design ☐ Architectural work

3

Year in Which Creation of This Work Was Completed

2003

This information must be given in all cases

Date and Nation of First Publication of This Particular Work

Complete this information ONLY if this work has been published

Month 5 Day 22 Year 2003

Nation

4

See instructions before completing this space

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2 ▼

Honor Life Inc
955 Park Center Drive
Vista CA 92081

Transfer If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2 give a brief statement of how the claimant(s) obtained ownership of the copyright ▼

APPLICATION RECEIVED

3-8-04 7-25-05

ONE DEPOSIT RECEIVED

3-8-04 7-25-05

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

MORE ON BACK ►

Complete all applicable spaces (numbers 5-4) on the reverse side of this page
See detailed instructions Sign the form at line 8

DO NOT WRITE HERE

Page 1 of 2 pages

EXHIBIT D
PAGE 10

EXAMINED BY

DW

FORM VA

CHECKED BY

☒ CORRESPONDENCE
Yes
FOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE IF YOU NEED MORE SPACE USE A SEPARATE CONTINUATION SHEET

PREVIOUS REGISTRATION Has registration for this work or for an earlier version of this work already been made in the Copyright Office?

☐ Yes ☒ No If your answer is Yes, why is another registration being sought? (Check appropriate box) ▼
a ☐ This is the first published edition of a work previously registered in unpublished formb ☐ This is the first application submitted by this author as copyright claimantc ☐ This is a changed version of the work as shown by space 6 on this application

If your answer is Yes, give Previous Registration Number ▼

Year of Registration ▼

5

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates ▼

Antique classical design

a 6
See instructions
before completing
this space

b. Material Added to This Work Give a brief general statement of the material that has been added to this work and in which copyright is claimed ▼

Adaptation of design plus additional artwork and modification of design to format of cut stone medallion

b

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account
Name ▼ Account Number ▼

a

7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent: Name/Address/Apt/City/State/ZIP ▼

 Roderick J. Geis
Honor Life, Inc
955 Park Center Drive
Vista, CA 92081

Area code and daytime telephone number (760) 727 8561

Fax number (760) 727 2451

Email rgeis@honorlife.com

b

CERTIFICATION* I, the undersigned, hereby certify that I am the

check only one ►

☐ author☐ other copyright claimant☐ owner of exclusive right(s)☒ authorized agent of Honor Life, Inc

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date

Roderick J. Geis

Date 03/17/2004

Handwritten signature (X) ▼

x

Certificate
will be
mailed in
window
envelope
to this
address

Name ▼

Honor Life, Inc

Number/Street/Apt ▼

955 Park Center Drive

City/State/ZIP ▼

Vista, CA 92081

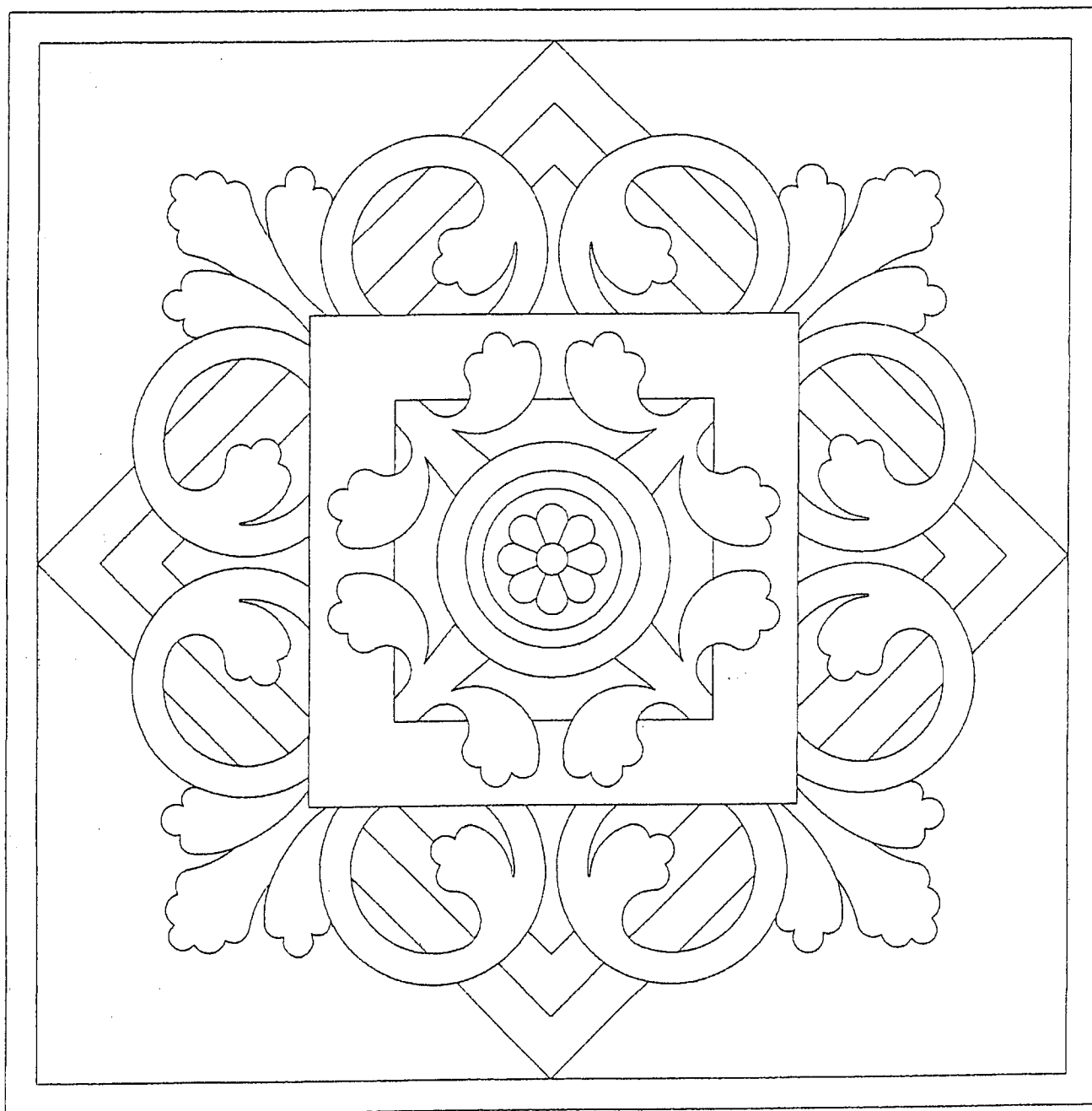
Complete all necessary spaces
Sign your application in space 8
 1. Application form
2. Nonrefundable filing fee in check or money
order payable to Registrar of Copyrights
3. Deposit material

 Library of Congress
Copyright Office
101 Independence Avenue S.E.
Washington, D.C. 20540-6000

 Fees are subject to
change. For current
fees, visit the
Copyright Office
website at
www.copyright.gov
or call the Copyright
Office at toll
(800) 770-9000

9

17 U.S.C. § 508(a) Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409 or in any written statement filed in connection with the application shall be fined not more than \$2,500.



Honor Life Medallion #3075-01

COMPLAINT

EXHIBIT "E"

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America



Form VA
For a Work of the Visual Arts
UNITED STATES COPYRIGHT OFFICE

VA 1-311-698



EFFECTIVE DATE OF REGISTRATION

MARCH 8 2004
Month Day Year

DO NOT WRITE ABOVE THIS LINE IF YOU NEED MORE SPACE USE A SEPARATE CONTINUATION SHEET

1

Title of This Work ▼

2930-01

NATURE OF THIS WORK ▼ See Instructions

Design of cut stone

Previous or Alternative Titles ▼

Publication as a Contribution If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give

Volume ▼

Number ▼

Issue Date ▼

On Pages ▼

2

NOTE

Under the law the author of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was made for hire, check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as Author of that part and leave the space for dates of birth and death blank.

NAME OF AUTHOR ▼

a Honor Life, Inc

DATES OF BIRTH AND DEATH

Year Born ▼

Year Died ▼

Was this contribution to the work a "work made for hire"?

☒ Yes

☐ No

Author's Nationality or Domicile

Name of Country

OR { Citizen of USA

Domiciled in USA

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☒ No

Pseudonymous? ☐ Yes ☒ No

If the answer to either of these questions is "Yes" see detailed instructions

Nature of Authorship Check appropriate box(es) See Instructions

☐ 3 Dimensional sculpture

☐ Map

☐ Technical drawing

☒ 2 Dimensional artwork

☐ Photograph

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

Name of Author ▼

b

Dates of Birth and Death

Year Born ▼

Year Died ▼

Was this contribution to the work a "work made for hire"?

☐ Yes

☐ No

Author's Nationality or Domicile

Name of Country

OR { Citizen of _____

Domiciled in _____

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☐ No

Pseudonymous? ☐ Yes ☐ No

If the answer to either of these questions is "Yes" see detailed instructions

Nature of Authorship Check appropriate box(es) See Instructions

☐ 3 Dimensional sculpture

☐ Map

☐ Technical drawing

☐ 2 Dimensional artwork

☐ Photograph

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

3

Year in Which Creation of This Work Was

Completed

a 2003

This information must be given ONLY if this work has been published

Date and Nation of First Publication of This Particular Work

Complete this information ONLY if this work has been published

b Month 8

Day 1

Year 2003

Nation

4

See Instructions before completing this space

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

Honor Life, Inc
955 Park Center Drive
Vista, CA 92081

Transfer If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED

MARCH 8 2004 7-25-05

ONE DEPOSIT RECEIVED

MARCH 8 2004 7-25-05

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

MORE ON BACK ►

Complete all applicable spaces (numbers 5-9) on the reverse side of the form. Sign the form at line 8.

DO NOT WRITE HERE
Page 1 of 2 Pages

EXHIBIT E
PAGE 13

* Deleted by C O on authority of phone call
on 8/5/05 with Roderick J Geis

EXAMINED BY

DW

FORM VA

CHECKED BY

☒ CORRESPONDENCE
Yes

FOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE IF YOU NEED MORE SPACE USE A SEPARATE CONTINUATION SHEET

PREVIOUS REGISTRATION Has registration for this work or for an earlier version of this work already been made in the Copyright Office?

☐ Yes ☒ No If your answer is Yes why is another registration being sought? (Check appropriate box) ▼
a ☐ This is the first published edition of a work previously registered in unpublished formb ☐ This is the first application submitted by this author as copyright claimantc ☐ This is a changed version of the work as shown by space 6 on this application

If your answer is Yes give Previous Registration Number ▼

Year of Registration ▼

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work complete only 6b for a compilation

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates ▼

* ~~Adaptation of design plus additional artwork and modification of design to format of new state trade dress~~

a 5
See instructions
before completing
this space

b Material Added to This Work Give a brief general statement of the material that has been added to this work and in which copyright is claimed ▼

* ~~Adaptation of design plus additional artwork and modification of design to format of new state trade dress~~

b

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office give name and number of Account

Name ▼

Account Number ▼

a

CORRESPONDENCE Give name and address to which correspondence about this application should be sent Name/Address/Apt/City/State/ZIP ▼

Roderick J Geis
Honor Life Inc
955 Park Center Drive
Vista CA 92081

Area code and daytime telephone number (760) 727 8561

Fax number (760) 727 2451

Email rgeis@honorlife.com

b

CERTIFICATION* I, the undersigned hereby certify that I am the

check only one ►

- ☐ author
☐ other copyright claimant
☐ owner of exclusive right(s)
☒ authorized agent of

Honor Life Inc

Name of author or other copyright claimant, or owner of exclusive right(s) A

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge

Typed or printed name and date ▼ If this application gives a date of publication in space 3 do not sign and submit it before that date

Roderick J Geis

Date 03/17/2004

Handwritten signature (X) ▼

x

Certificate
will be
mailed in
window
envelope
to this
address

Name ▼

Honor Life Inc

Number/Street/Apt ▼

955 Park Center Drive

City/State/ZIP ▼

Vista CA 92081

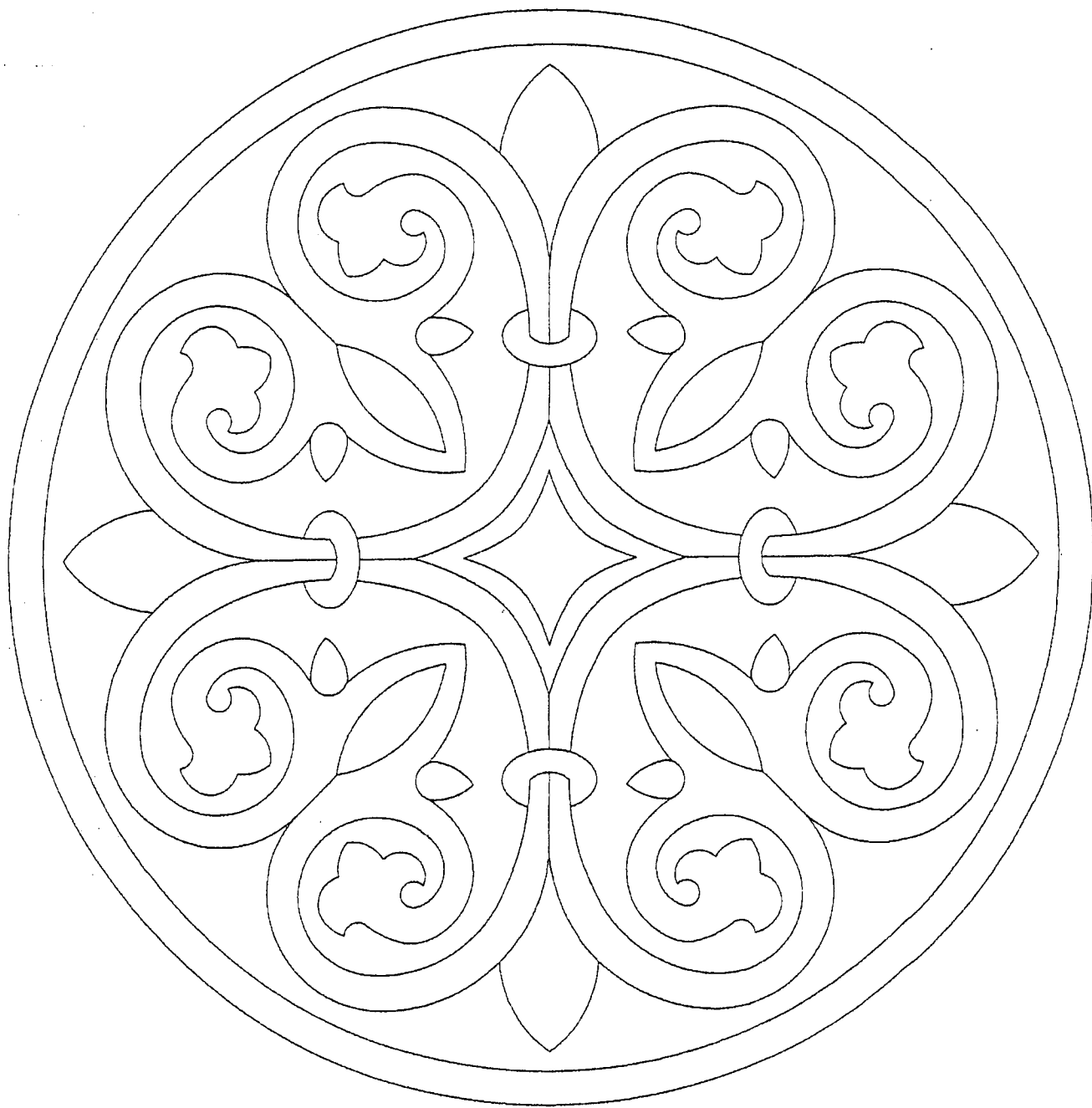
2. FEE
Complete all necessary spaces
Sign your application in space 8

1. Application form
2. Nonrefundable filing fee in check or money
order payable to Register of Copyrights
3. Deposit material

Library of Congress
Copyright Office
101 Independence Avenue S.E.
Washington D.C. 20559-6000

From the request to
stamp. For correct
I will submit the
Copyright Office
instructions at
www.copyright.gov
and the Copyright
Office at (202) 707-3000

17 U.S.C. § 508(e) Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 408 or in any written statement filed in connection with the application shall be fined not more than \$2,500



Honor Life Medallion #2930-01

COMPLAINT

EXHIBIT "F"

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Margbeth Peters
Register of Copyrights, United States of America



Form VA
For a Work of the Visual Arts

VA 1-299-787



EFFECTIVE DATE OF REGISTRATION

FEB 08 2005

Month Day Year

DO NOT WRITE ABOVE THIS LINE IF YOU NEED MORE SPACE USE A SEPARATE CONTINUATION SHEET

1

Title of This Work ▼

NATURE OF THIS WORK ▼ See instructions

3205 01

Design of cut stone

Previous or Alternative Titles ▼

Publication as a Contribution. If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give

Volume ▼

Number ▼

Issue Date ▼

On Pages ▼

2

NOTE

Under the law the author of a work made for hire is generally the employer, not the employee (see instructions). For any part of this work that was made for hire, check "Yes" in the space provided, give the employee (or other person for whom the work was prepared) as Author of that part and leave the space for dates of birth and death blank.

NAME OF AUTHOR ▼

a Honor Life Inc

DATES OF BIRTH AND DEATH

Year Born ▼

Year Died ▼

Was this contribution to the work a work made for hire? ▼

☒ Yes

☐ No

Author's Nationality or Domicile

Name of Country

OR

Citizen of

USA

Domiciled in

USA

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☒ No

Pseudonymous? ☐ Yes ☒ No

If the answer to either of these questions is "Yes," see detailed instructions.

Nature of Authorship Check appropriate box(es) See instructions

☐ 3 Dimensional sculpture

☐ Map

☐ Technical drawing

☒ 2 Dimensional artwork

☐ Photograph

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

Name of Author ▼

b

Dates of Birth and Death

Year Born ▼

Year Died ▼

Was this contribution to the work a work made for hire? ▼

☐ Yes

☐ No

Author's Nationality or Domicile

Name of Country

OR

Citizen of

Domiciled in

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☐ No

Pseudonymous? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions.

Nature of Authorship Check appropriate box(es) See instructions

☐ 3 Dimensional sculpture

☐ Map

☐ Technical drawing

☐ 2 Dimensional artwork

☐ Photograph

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

3

a Year in Which Creation of This Work Was Completed

2005

This information must be given ONLY if this work has been published.

b Date and Nation of First Publication of This Particular Work

Month 1 Day 11 Year 2005

USA

Nation

4

See instructions before completing this space

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author in space 2 ▼

Honor Life Inc

955 Park Center Drive

Vista CA 92081

Transfer (If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

DO NOT WRITE HERE OFFICE USE ONLY

REPLICATION RECEIVED

FEB 08 2005

ONE DEPOSIT RECEIVED

FEB 08 2005

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

MORE ON BACK ►

Complete all applicable spaces (numbers 5-9) on the reverse side of this page. See detailed instructions. Sign the form at line 8.

DO NOT WRITE HERE

Page 1 of 2 pages

EXHIBIT F
PAGE 16

EXAMINED BY SDW

FORM VA

CHECKED BY

☒ CORRESPONDENCE

Yes

FOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE IF YOU NEED MORE SPACE USE A SEPARATE CONTINUATION SHEET

PREVIOUS REGISTRATION Has registration for this work or for an earlier version of this work already been made in the Copyright Office?

☐ Yes ☒ No If your answer is Yes, why is another registration being sought? (Check appropriate box) ▼a ☐ This is the first published edition of a work previously registered in unpublished formb ☐ This is the first application submitted by this author as copyright claimantc ☐ This is a changed version of the work as shown by space 6 on this application

If your answer is Yes, give Previous Registration Number ▼

Year of Registration ▼

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for derivative work; complete only 6b for a compilation

a Preexisting Material Identify any preexisting work or works that this work is based on or incorporates ▼

Antique classical design

b Material Added to This Work Give a brief general statement of the material that has been added to this work and in which copyright is claimed ▼

Adaptation of design plus additional artwork and modification of design to format of cut stone medallion

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account

Name ▼

Account Number ▼

CORRESPONDENCE Give name and address to which correspondence about this application should be sent Name/Address/Apt/City/State/ZIP ▼

Roderick J Geis
Honor Life Inc
955 Park Center Drive
Vista CA 92081

Area code and daytime telephone number (760) 727 8561

Fax number (760) 727 2451

Email rgeis@honorlife.com

CERTIFICATION* I, the undersigned, hereby certify that I am the

check only one ▶

☐ author☐ other copyright claimant☐ owner of exclusive right(s)☒ authorized agent of Honor Life Inc

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date

Roderick J Geis

Date 02/03/2005

Handwritten signature (X) ▼

X Roderick J GeisCertificate
will be
mailed in
window
envelope
to this
address

Name ▼

Honor Life Inc

Number/Street/Apt ▼

955 Park Center Drive

City/State/ZIP ▼

Vista CA 92081

YOU MUST:

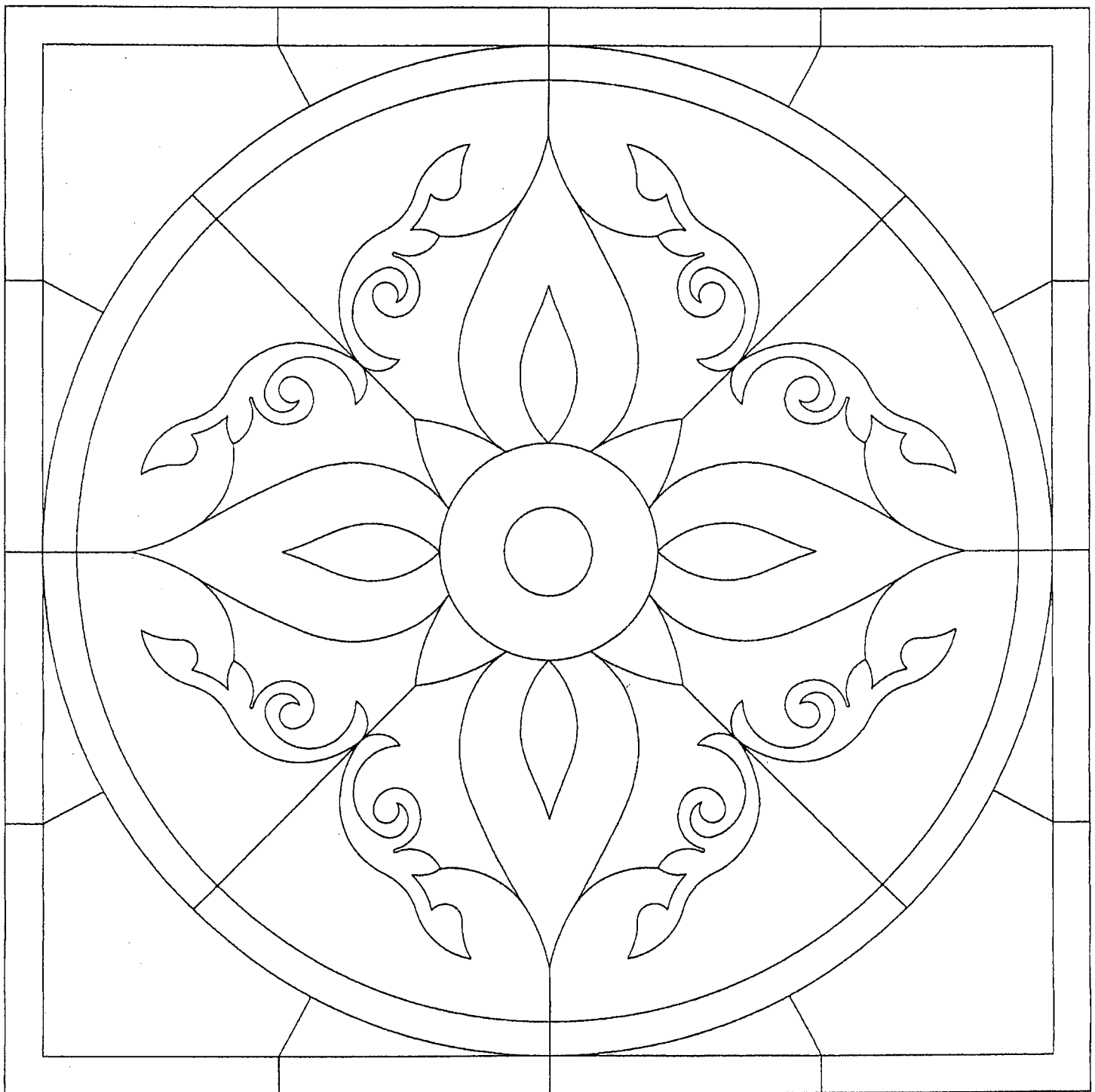
Complete all necessary spaces
Sign your application in space 8SEND ALL ELEMENTS
IN THE SAME PACKAGE:

- 1 Application to me
- 2 Nonreturnable filing fee in check or money order payable to Register of Copyrights
- 3 Deposit material

MAIL TO:

Library of Congress
Copyright Office
101 Independence Avenue, S.E.
Washington, D.C. 20540-6000

17 U.S.C. § 508(e) Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 408 or in any written statement filed in connection with the application, shall be fined not more than \$2,500.



Honor Life Medallion #3205-01

COMPLAINT

EXHIBIT "G"

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Margareth Peters

Register of Copyrights, United States of America



Form VA
For a Work of the Visual Arts

VA 1-299-781



EFFECTIVE DATE OF REGISTRATION

FEB 08 2005

Month Day Year

DO NOT WRITE ABOVE THIS LINE IF YOU NEED MORE SPACE USE A SEPARATE CONTINUATION SHEET

1

Title of This Work ▼

NATURE OF THIS WORK ▼ See Instructions

3026 01

Design of cut stone

Previous or Alternative Titles ▼

Publication as a Contribution If this work was published as a contribution to a periodical, serial, or collection, give information about the entire work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give Volume ▼

Number ▼

Issue Date ▼

On Pages ▼

2

NOTE

Under the law, the author of a work made for hire is generally the employer, not the employee (see instructions). For any part of this work that was made for hire, check "Yes" in the space provided. Give the employer (or other person for whom the work was prepared) as Author of that part and leave the space for dates of birth and death blank.

NAME OF AUTHOR ▼

a Honor Life Inc

DATES OF BIRTH AND DEATH

Year Born ▼

Year Died ▼

Was this contribution to the work a work made for hire?

☒ Yes
☐ No

Author's Nationality or Domicile

Name of Country

OR Citizen of USA

Domiciled in USA

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☒ No

Pseudonymous? ☐ Yes ☒ No

If the answer to either of these questions is "Yes," see detailed instructions.

Nature of Authorship Check appropriate box(es) See Instructions

☐ 3 Dimensional sculpture

☐ Map

☐ Technical drawing

☒ 2 Dimensional artwork

☐ Photograph

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

Name of Author ▼

Dates of Birth and Death

Year Born ▼

Year Died ▼

Was this contribution to the work a work made for hire?

☐ Yes
☐ No

Author's Nationality or Domicile

Name of Country

OR Citizen of

Domiciled in

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☐ No

Pseudonymous? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions.

Nature of Authorship Check appropriate box(es) See Instructions

☐ 3 Dimensional sculpture

☐ Map

☐ Technical drawing

☐ 2 Dimensional artwork

☐ Photograph

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

3

Year in Which Creation of This Work Was Completed

2005

This information must be given in all cases

Date and Nation of First Publication of This Particular Work

Complete this information ONLY if this work has been published

Month

Day

Year

USA

Nation

4

See instructions before completing this space

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2 ▼

Honor Life Inc

955 Park Center Drive

Vista CA 92081

Transfer If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright ▼

APPLICATION RECEIVED

FEB 08 2005

ONE DEPOSIT RECEIVED

FEB 08 2005

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

MORE ON BACK ►

Complete all applicable spaces (numbered 1-9) on the reverse side of this page. See detailed instructions. Sign the form at line 8.

DO NOT WRITE HERE

Page 1 of 2 pages

EXHIBIT G
PAGE 19

EXAMINED BY

FORM VA

CHECKED BY

CORRESPONDENCE

Yes

FOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE IF YOU NEED MORE SPACE USE A SEPARATE CONTINUATION SHEET

PREVIOUS REGISTRATION Has registration for this work or for an earlier version of this work already been made in the Copyright Office?

☐ Yes ☒ No If your answer is Yes why is another registration being sought? (Check appropriate box) ▼a ☐ This is the first published edition of a work previously registered in unpublished formb ☐ This is the first application submitted by this author as copyright claimantc ☐ This is a changed version of the work as shown by space 6 on this application

If your answer is Yes give Previous Registration Number ▼

Year of Registration ▼

DERIVATIVE WORK OR COMPI LATION Complete both space 6a and 6b for a derivative work complete only 6b for a compilation

a Preexisting Material Identify any preexisting work or works that this work is based on or incorporates ▼

Antique classical design

b Material Added to This Work Give a brief general statement of the material that has been added to this work and in which copyright is claimed ▼

Adaptation of design plus additional artwork and modification of design to format of cut stone medallion

DEPOSIT ACCOUNT If the registration fee is to be charged in a Deposit Account established in the Copyright Office give name and number of Account
Name ▼ Account Number ▼

CORRESPONDENCE Give name and address to which correspondence about this application should be sent Name/Address/Apt/City/State/ZIP ▼

Roderick J Geis
Honor Life Inc
955 Park Center Drive
Vista CA 92081

Area code and daytime telephone number (760) 727 8561

Fax number (760) 727 2451

Email rgeis@honorlife.com

CERTIFICATION* I the undersigned hereby certify that I am the

check only one ►

☐ author☐ other copyright claimant☐ owner of exclusive right(s)☒ authorized agent of Honor Life Inc

Name of author or other copyright claimant or owner of exclusive right(s)

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge

Typed or printed name and date ▼ If this application gives a date of publication in space 3 do not sign and submit it before that date

Roderick J Geis

Date 02/03/2005

Handwritten signature (X) ▼

x

Certificate
will be
mailed in
window
envelope
to this
address

Name ▼

Honor Life Inc

Number/Street/Apt ▼

955 Park Center Drive

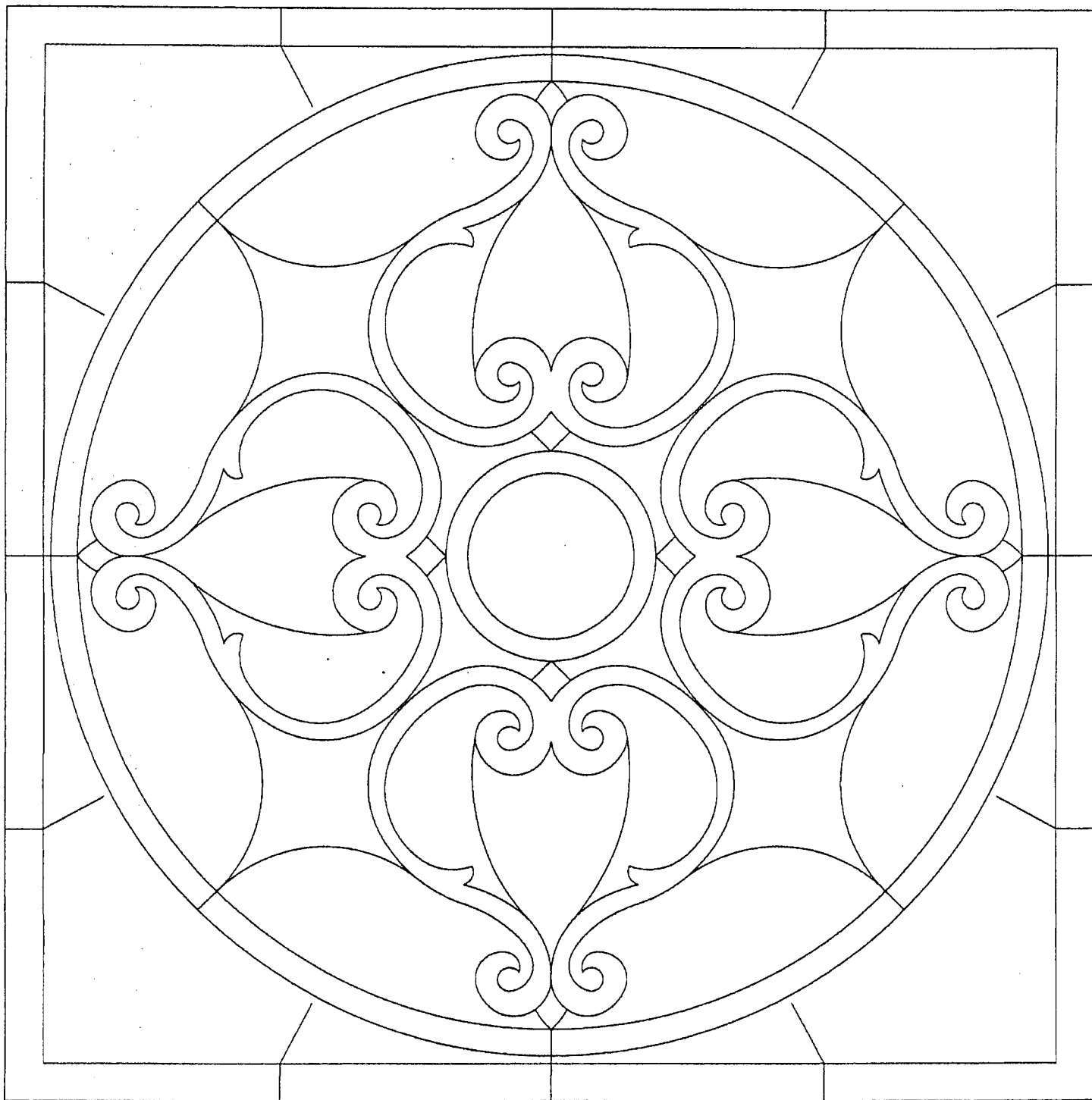
City/State/ZIP ▼

VISTA CA 92081

YOU MUST

Complete all necessary spaces
Sign your application in space 8SEND ALL 3 ELEMENTS
IN THE SAME PACKAGE1 Application form
2 Nonrefundable filing fee in check or money
order payable to Registrar of Copyrights
3 Deposit made atMAIL TO:
Library of Congress
Copyright Office
101 Independence Avenue S.E.
Washington D.C. 20540-6000

17 U.S.C. § 506(e) Any person who knowingly makes a false representation of a material fact in the application for copyright or at any time provided for by section 409 or in any written statement filed in connection with this application shall be fined not more than \$2,500



Honor Life Medallion #3026-01

COMPLAINT

EXHIBIT "H"

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters
Register of Copyrights, United States of America



Form VA

Form VA

VA 1-380-758

REGIST



MAR0001300758

VA VAU
EFFECTIVE DATE OF REGISTRATION

Month Day Year
Sep 5 2008

STATE CONTINUATION SHEET.

1

Title of This Work ▼

2275-01

NATURE OF THIS WORK ▼ See instructions

Design of cut stone

Previous or Alternative Titles ▼

Publication as a Contribution If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared Title of Collective Work ▼

If published in a periodical or serial give

Volume ▼

Number ▼

Issue Date ▼

On Pages ▼

2

NAME OF AUTHOR ▼

a Honor Life, Inc.

DATES OF BIRTH AND DEATH

Year Born ▼

Year Died ▼

Was this contribution to the work a "work made for hire"?

☒ Yes☐ No

Author's Nationality or Domicile

Name of Country

OR

Citizen of

USA

Domiciled in

USA

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☒ NoPseudonymous? ☐ Yes ☒ No

If the answer to either of these questions is "Yes," see detailed instructions

Nature of Authorship Check appropriate box(es) See instructions

☐ 3-Dimensional sculpture☐ Map☐ Technical drawing☒ 2-Dimensional artwork☐ Photograph☐ Text☐ Reproduction of work of art☐ Jewelry design☐ Architectural work

Name of Author ▼

Dates of Birth and Death

Year Born ▼

Year Died ▼

Was this contribution to the work a "work made for hire"?

☐ Yes☐ No

Author's Nationality or Domicile

Name of Country

OR

Citizen of

Domiciled in

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☐ NoPseudonymous? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions

Nature of Authorship Check appropriate box(es) See instructions

☐ 3-Dimensional sculpture☐ Map☐ Technical drawing☐ 2-Dimensional artwork☐ Photograph☐ Text☐ Reproduction of work of art☐ Jewelry design☐ Architectural work

3

a Year in Which Creation of This Work Was Completed
2006

This information must be given Year in all cases

Date and Nation of First Publication of This Particular Work

b Complete this information ONLY if this work has been published

Month 8

Day 29

Year 2006

USA

Nation

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2 ▼

Honor Life, Inc.

955 Park Center Drive

Vista, CA 92081

Transfer If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright ▼

APPLICATION RECEIVED

SEP 05 2006

ONE DEPOSIT RECEIVED

SEP 05 2006

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

MORE ON BACK ►

• Complete all applicable spaces (numbers 5-9) on the reverse side of this page
• See detailed instructions
• Sign the form at line 8

DO NOT WRITE HERE

Page 1 of 1 pages

EXHIBIT H
PAGE 22

EXAMINED BY <i>[Signature]</i>	FORM VA
CHECKED BY <i>[Signature]</i>	
<input type="checkbox"/> CORRESPONDENCE	FOR
Yes	COPYRIGHT
	OFFICE
	USE
	ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☒ No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼a. ☐ This is the first published edition of a work previously registered in unpublished formb. ☐ This is the first application submitted by this author as copyright claimantc. ☐ This is a changed version of the work, as shown by space 6 on this application

If your answer is "Yes," give Previous Registration Number ▼

Year of Registration ▼

5

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work, complete only 6b for a compilation

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates ▼

a 6
See instructions
before completing
this space

b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed ▼

b

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account

Name ▼

Account Number ▼

a

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP ▼

b

Roderick J. Geis
Honor Life, Inc.
955 Park Center Drive
Vista, CA 92081

Area code and daytime telephone number (760) 727-8561

Fax number (760) 727-2451

Email rgeis@honorlife.com

CERTIFICATION* I, the undersigned, hereby certify that I am the

check only one ▶

☐ author☐ other copyright claimant☐ owner of exclusive right(s)☒ authorized agent of Honor Life, Inc.

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date

Roderick J. Geis

Date 08/29/2006

Handwritten signature (X) ▼

X

Name ▼
Honor Life, Inc.

Number/Street/Apt ▼

955 Park Center Drive

City/State/ZIP ▼

Vista, CA 92081

Certificate
will be
mailed in
window
envelope
to this
address:

YOU MUST:

- Complete all necessary spaces
- Sign your application in space 8

**SEND ALL 3 ELEMENTS
(IN THE SAME PACKAGE):**

1. Application form
2. Nonrefundable filing fee in check or money
order payable to Register of Copyrights
3. Deposit material

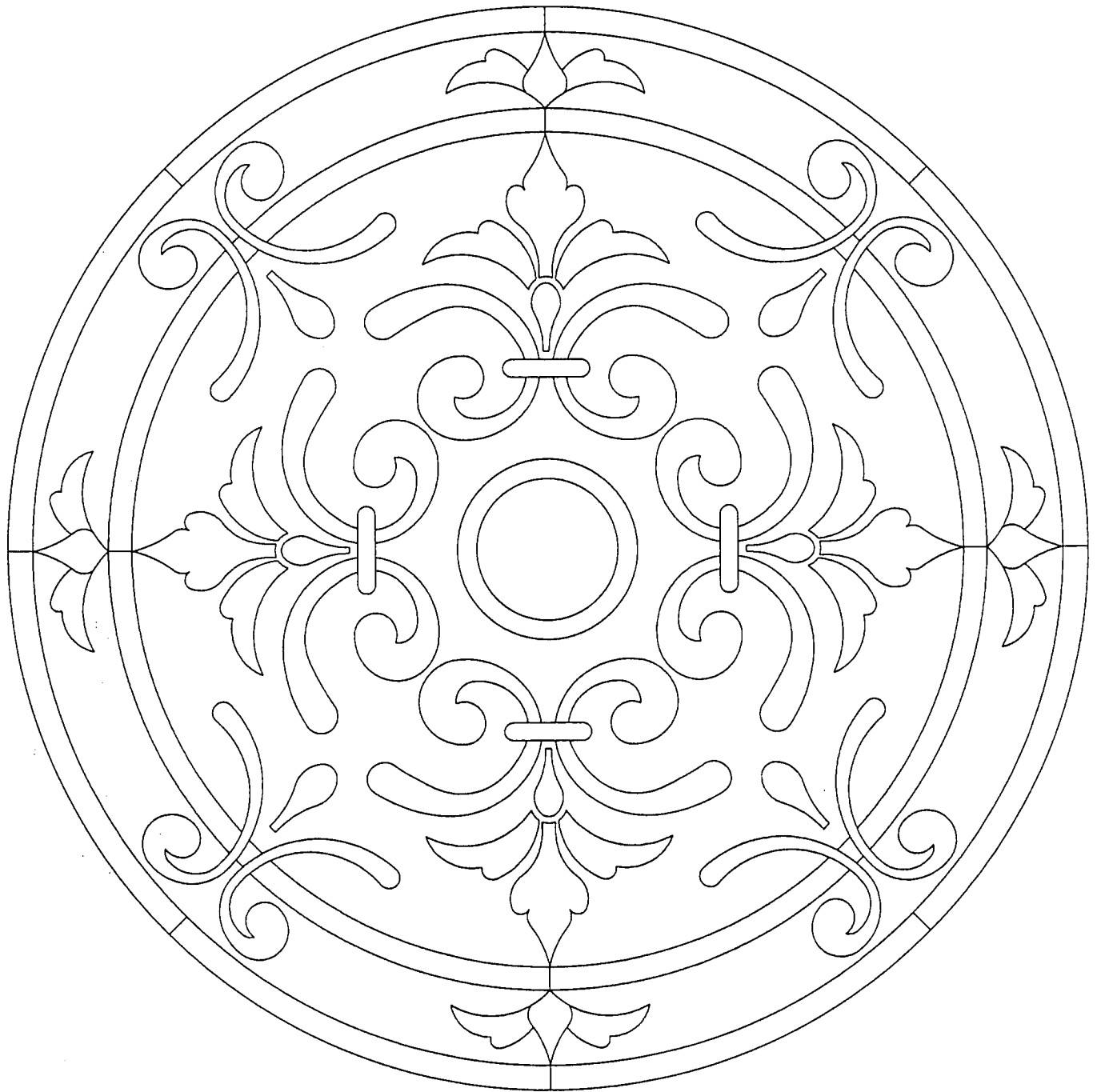
MAIL TO:
Library of Congress
Copyright Office
101 Independence Avenue, S.E.
Washington, D.C. 20559-6000

Form can be ordered or
changed. For current
form, check the
Copyright Office
website at
www.copyright.gov
write the Copyright
Office or call
(202) 707-5949

9

*17 U.S.C. § 506(a). Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

EXHIBIT H
PAGE 23



Honor Life Medallion #2275-01

COMPLAINT

EXHIBIT "I"




POLISHED PORCELAIN SERIES

RUSTIC SERIES

WALL TILE SERIES

MEDALLIONS

UPCOMING EVENTS



ABOUT UNICORN TILE

Welcome to Unicorn Tile Corp.

Based in Anaheim, California, Unicorn Tile is one of the fastest growing distribution companies in the industry. Partnered with our factories in China, we are able to provide you with low competitive price, quality materials and constant stock availability of our inventories. We are always expanding our lines with new series and continuously improving the quality of our products.

Unicorn Tile prides itself on offering you a superior level of service and customer care. Blessed with our dedicated and friendly staff, you will experience a pleasant and helpful service from our samples, sales, order desk, warehouse, and accounting departments.

Our goal is to achieve mutually beneficial relationships with everyone and every company that we are in business with. Thank you very much for your interest in Unicorn Tile products.

Unicorn Tile Corp
2020 East Orangethorpe Avenue
Anaheim, CA 92806
Telephone (714) 525 1188
Facsimile (714) 525 1133

E-mail: info@unicorntiles.com

©2007 UNICORN TILE CORP

www.unicorn-tile.com>About

EXHIBIT I-2
PAGE 26

<http://www.unicorn-tile.com/about.asp>



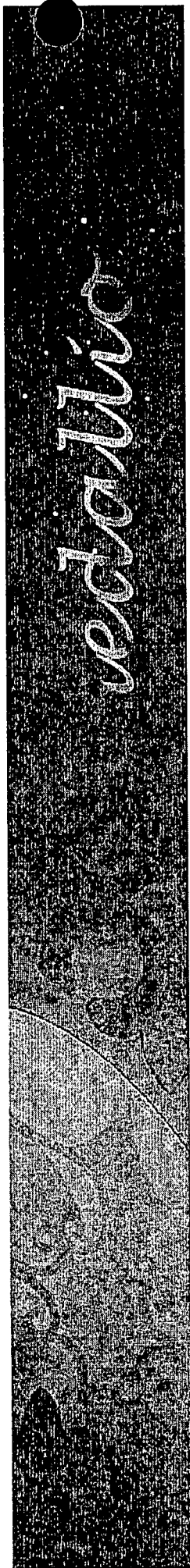
POLISHED PORCELAIN SERIES

RUSTIC SERIES

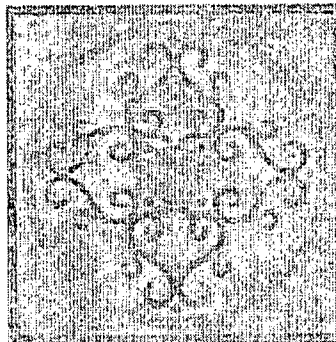
WALL TILE SERIES

MEDALLIONS

UPCOMING EVENTS



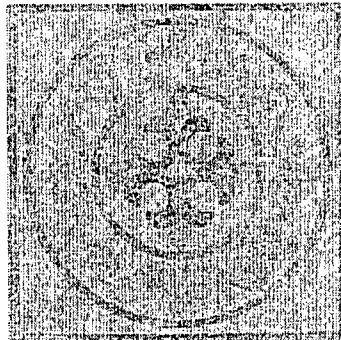
Medusa



size: 48"x48"

Tikar

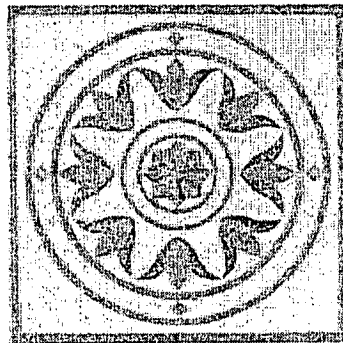
Batik



size: 36"x36" 48"x48"

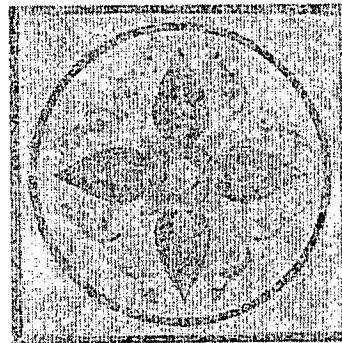
North Star

EXHIBIT I-3
PAGE 27

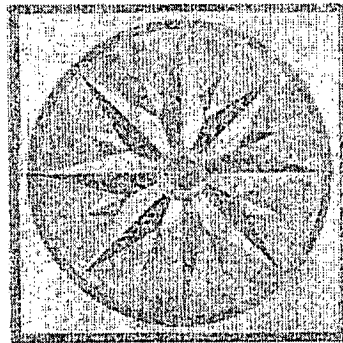


size: 36"x36" 48"x48"

Verona

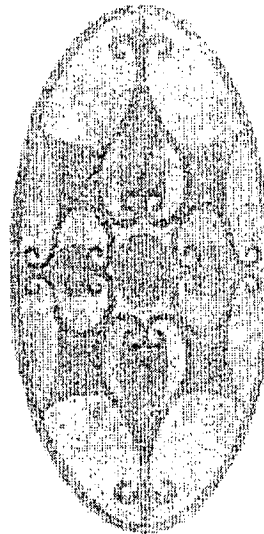


size: 36"x36"



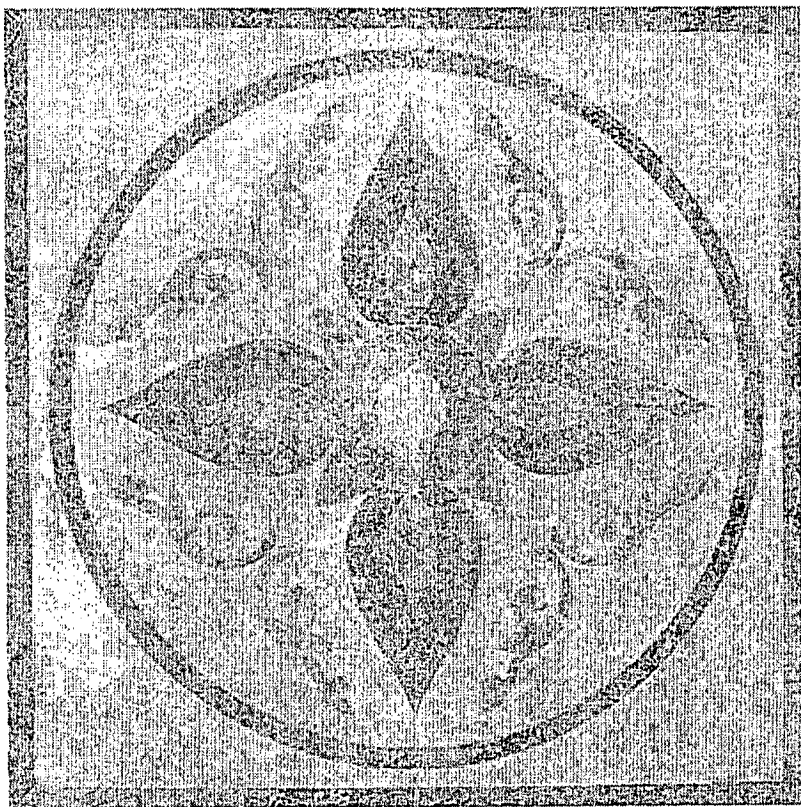
size: 24"x24" 36"x36" 48"x48"

Victoria

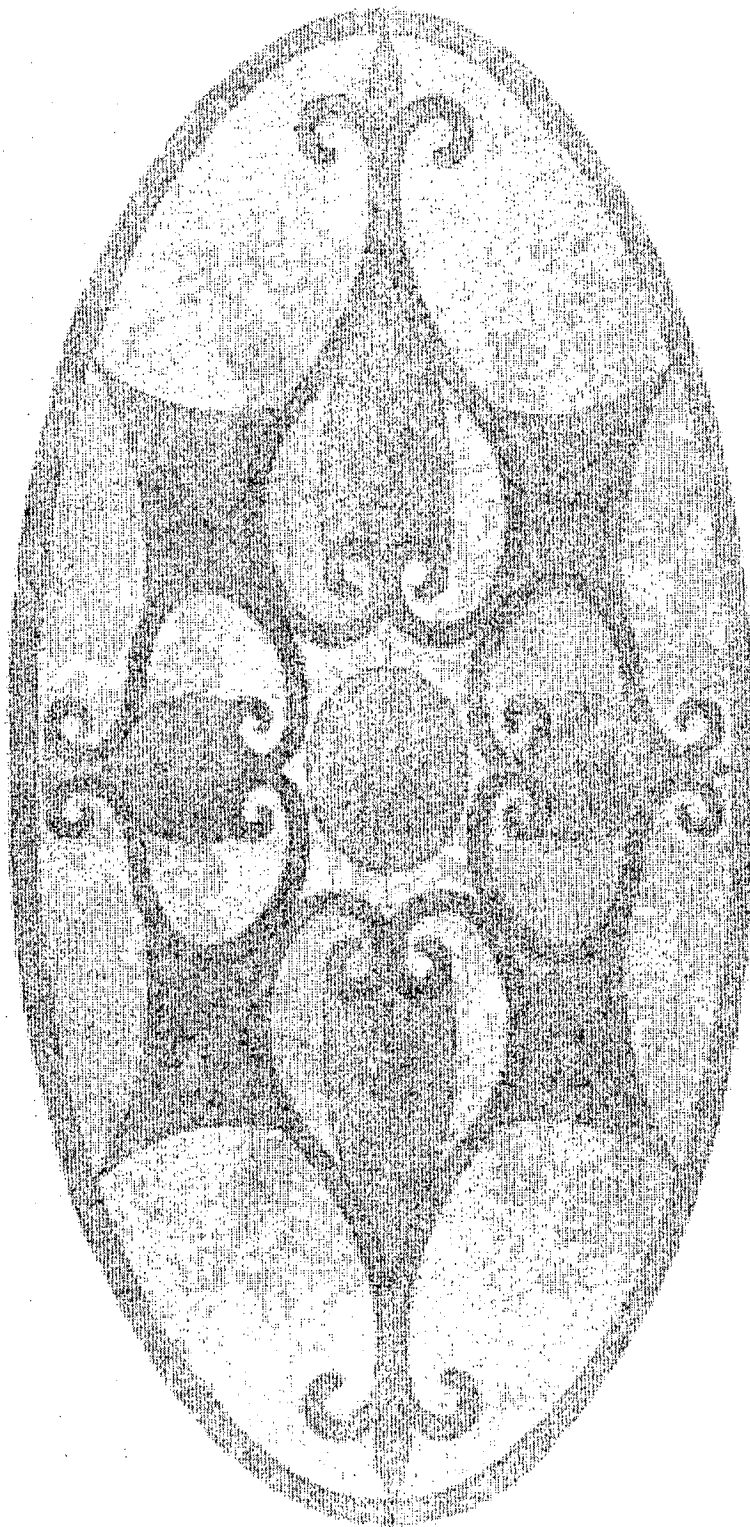


size: 36"x72"

Picasso



Verona
Size: 36"x36"



Victoria
Size: 36"x72"

COMPLAINT

EXHIBIT “J”



February 14, 2008

Mr. Tey Shen Mai
Unicorn Tile Corp.
2020 E. Orangethorpe Ave.
Anaheim, CA 92806

Dear Mr. Tey Shen Mai,

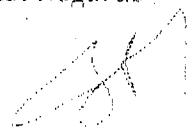
I met you at the Surfaces show and informed you that we owned copyrights on several of the designs in your 2008 product catalogue. Attached are copies of the copyrights for your Tikar, Victoria and Verona products. It is clear to us that these were taken directly off one of our web sites, most likely medallionoutlet.com. Your oval Victoria is a substantially similar copy of our 5025 01 design and is covered by our 3026 01 round copyright.

Based on our rights, we can demand that your company immediately stop selling or offering these designs and that you turn over all inventory and printed materials to us. Since you have spent money on your catalogue, distributed many of them and possibly sold product, we realize that this sort of demand would be detrimental to your business. So we would rather offer you a license fee to resolve this matter.

What we propose is an annual license fee for each design. This would get through 2008 and give you time to change your line for 2009 or you can continue to pay the annual fee to use the designs. The annual fee is \$1500.00 for each design.

Awaiting your reply.

Best Regards


Roger Souders
Vice President

COMPLAINT

EXHIBIT “K”



March 03, 2008


Honor Life Inc.
Mr. Roger Souders
955 Park Center Drive
Vista, CA 92081

Dear Mr. Souders,

Regarding your letter dated February 14, 2008 on medallion copyright issue, our company is not the producer of the medallions that we carry. Our Company purchased the medallions from factories in China. Based on the fact above, we are not pulling the products from the market and we are not paying any kind of license fees.

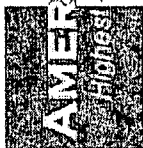
Thank you very much for your time and kind attention.

Sincerely,


Tey Shen Mai
UNICORN TILE CORP

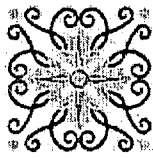
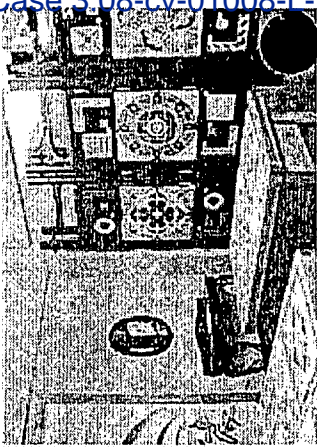
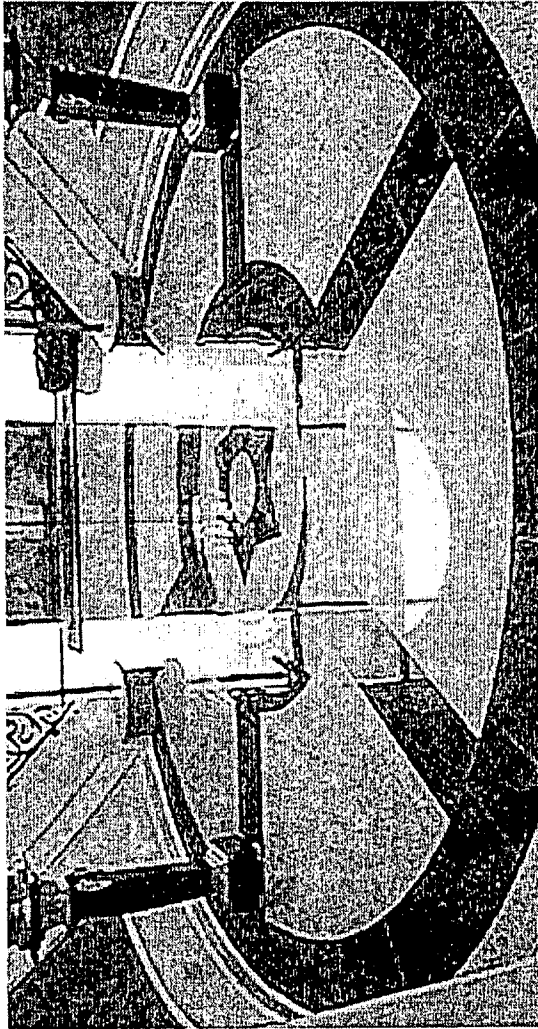
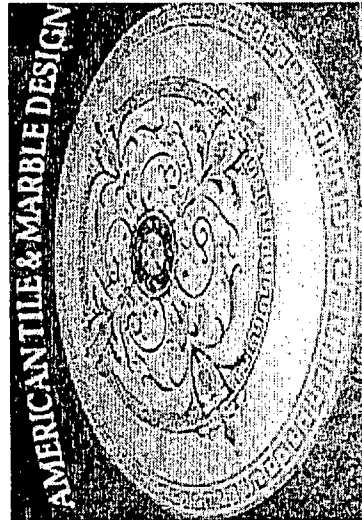
COMPLAINT

EXHIBIT “L”



AMERICAN TILE & MARBLE DESIGN
Highest Quality Products at Lowest Possible Prices

www.AmericanTileAndMarbleDesign.ca



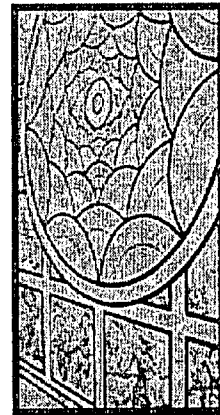
Our mission is to develop an honest, trustworthy, and dependable relationship with our customers, both on a personal and professional level.

Whether you are a builder, architect, designer or retailer, we invite you to our family and experience the excellence of our products and the superiority of our for yourself.

HOME PAGE | PRODUCTS | DELIVERY | ABOUT | CONTACT

Our Services

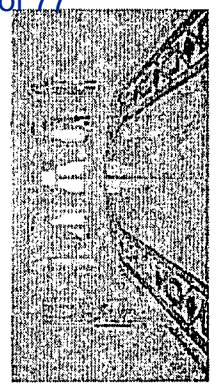
- MAJESTIC DESIGNS
- WATER-JET BORDER
- WATER-JET MEDALLIONS
- WATER-JET SQUARE
- SMALL SIZE MEDALLIONS
- MOSAIC MEDALLIONS
- MOSAIC BORDER
- MOSAIC TILE
- MOSAIC ART
- MOULDING



At American Tile and Marble Design, we are dedicated to providing our customers with the highest quality of products at the lowest possible prices. We offer a large selection of products

American Tile and Marble Design is a leading importer of mosaic and water jet medallions. Our medallions are available in a variety of sizes, dimensions, and designs.

We supply beautiful water jet medallions and tile borders for both residential and commercial flooring projects. All of our water jet medallions come with



Special orders

In addition to standard sizes and designs, we also accept special orders.

[More info](#)

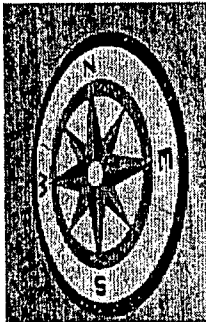


with prices to suit any budget.

We welcome you to compare our prices with other leading suppliers.

We believe our customers are the most important part of our business, therefore we strive for the highest level of customer satisfaction.

[More info](#)



aluminum backing for easy installation.

[More info](#)

These medallions range from 3/8" to 5" thickness, depending on the design, are very lightweight so that they can be installed with most any type of stone, hardwood floor. Our most popular sizes are 36" or 48" in diameter, round or square shapes.



2007 © Copyright
AmericanTileAndMarbleDesign.com
All rights reserved.

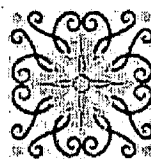
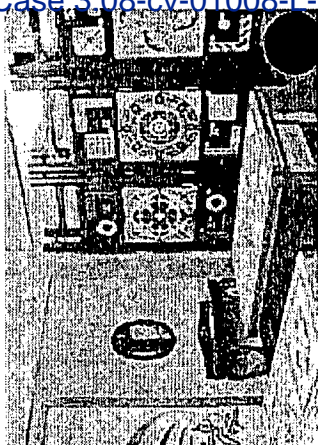
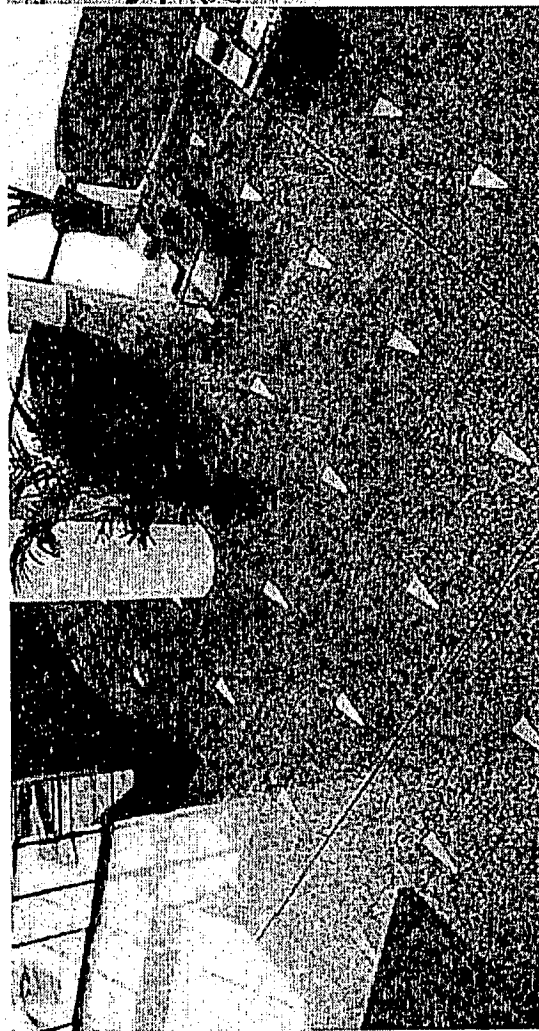
[Home page](#) [Products](#) [F.A.Q.](#) [Delivery](#) [About](#) [Contact](#)

AMERICAN TILE & MARBLE DESIGN

Highest Quality Products at Lowest Possible Prices



Our mission is to develop an honest, trustworthy, and dependable relationship with our customers, both on a personal and professional level.



Whether you are a builder, architect, designer or retailer, we invite you to our family and experience the excellence of our products and the superiority of our for yourself.

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Contact Us

American Tile and Marble Design
2125 E. Howell Ave., Suite B
Anaheim, CA 92806

Tel: (714) 456-9090
Fax: (714) 456-9085

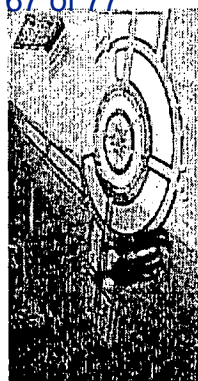
EMAIL CONTACT:

Please contact us with any questions you have:

American Tile and Marble Design are leading importers of mosaic and water jet medallions. Our medallions are available in a variety of sizes, dimensions, and designs.

Special orders

In addition to standard sizes and designs, we also accept special



We supply beautiful water jet medallions a

5/21/2008

orders.

[More info](#)

American Tile And Marble Design

2125 E. Howell Ave., Suite B
Anaheim, CA 92806
Tel: (714) 456-9090
Fax: (714) 456-9085
Email: info@AtMarbleDesign.com

info@AtMarbleDesign.com

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AmericanTileAndMarbleDesign.com
All rights reserved.

borders for both residential and commercial projects. All of our water jet medallions consist of aluminum backing for easy installation



EXHIBIT L-4
PAGE 36

Water-Jet Medallions - American Tile and Marble Design

We supply beautiful water jet medallions and tile borders for both residential and commercial flooring projects. All of our water jet medallions come with aluminum backing for easy installation.

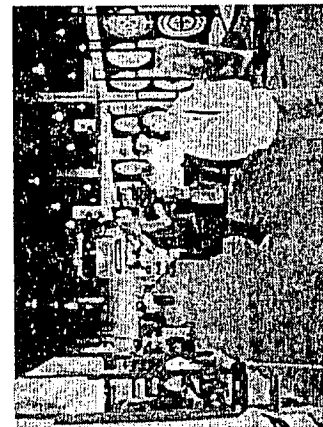
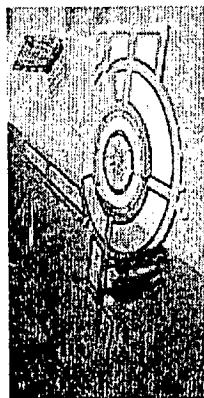
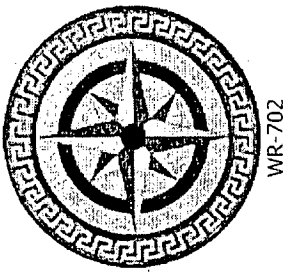
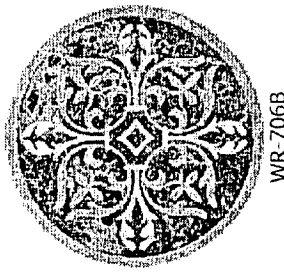


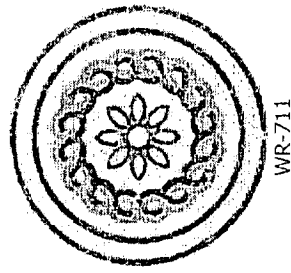
EXHIBIT L-5
PAGE 37



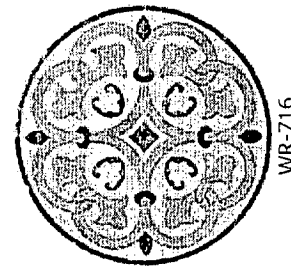
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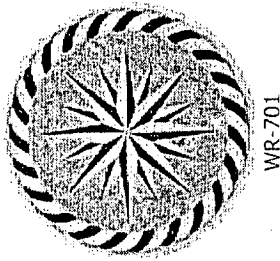
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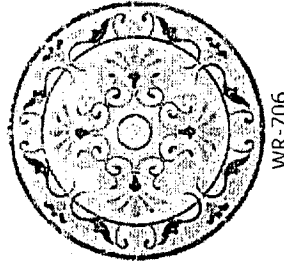
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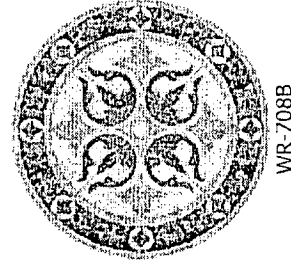
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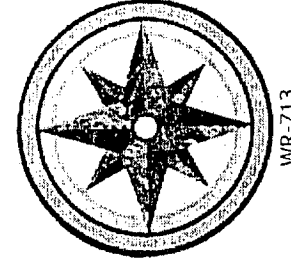
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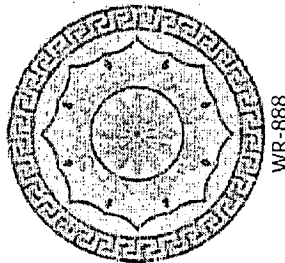
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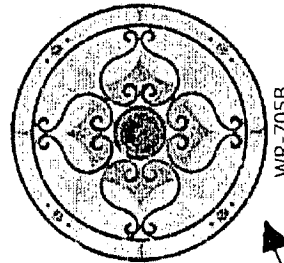
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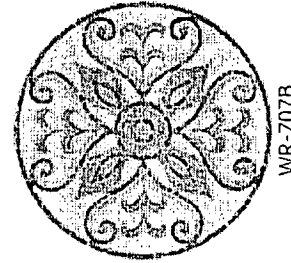
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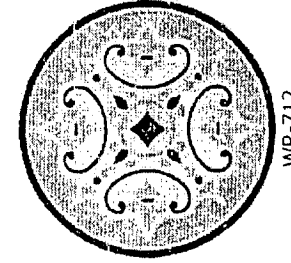
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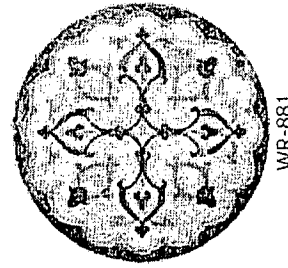
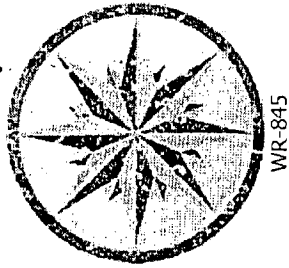
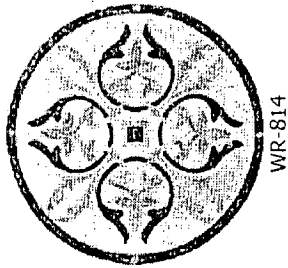
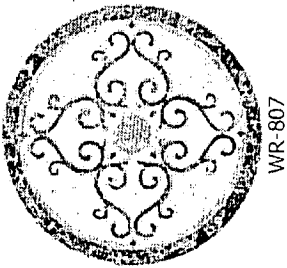
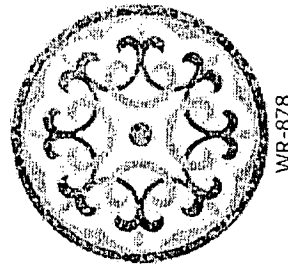
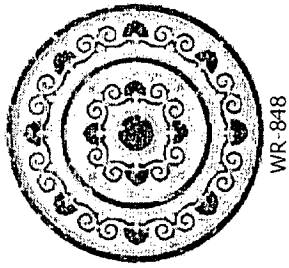
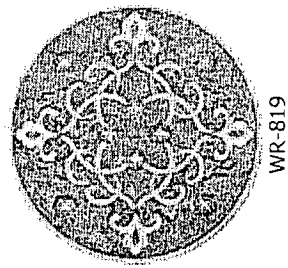
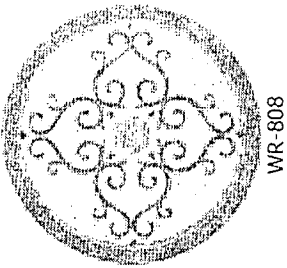
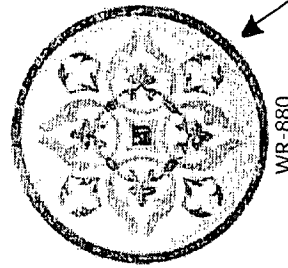
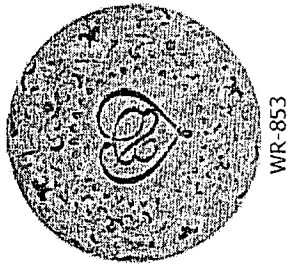
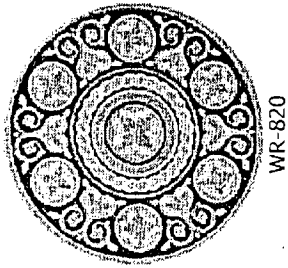
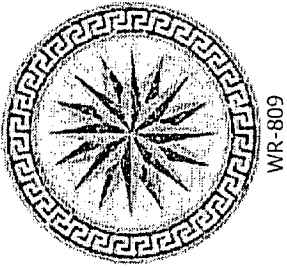
WR-705B



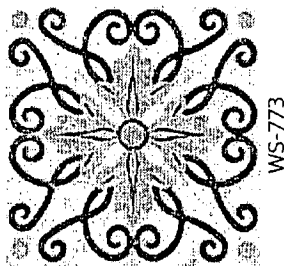
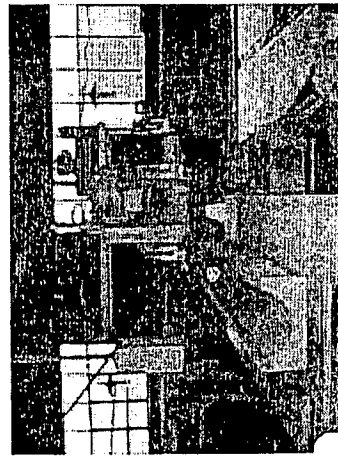
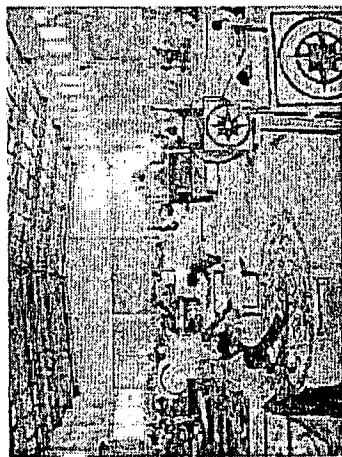
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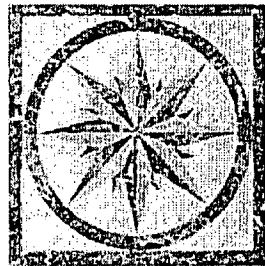
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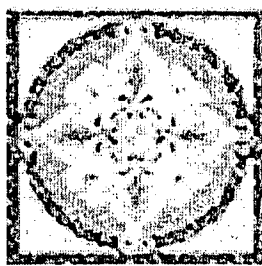
tile borders for both residential and commercial flooring projects. All of our water jet medallions come with aluminum backing for easy installation.



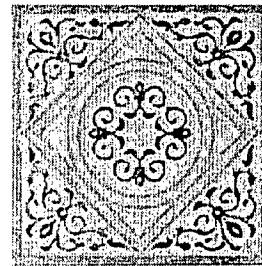
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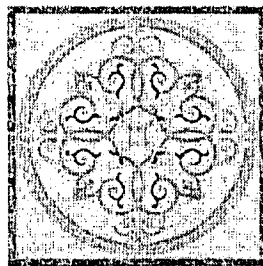
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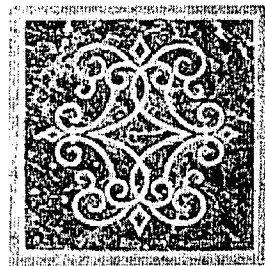
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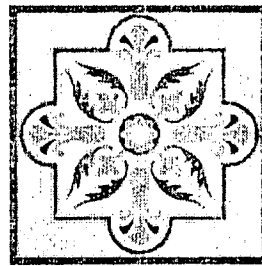
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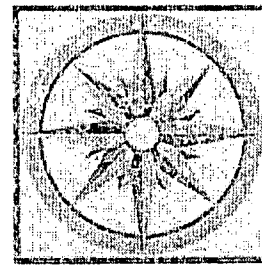
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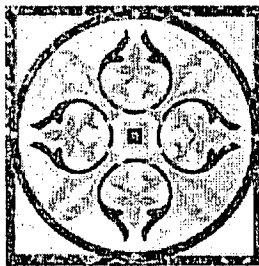
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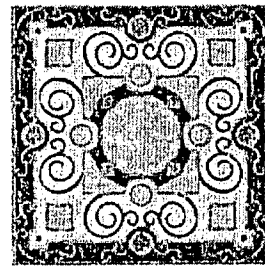
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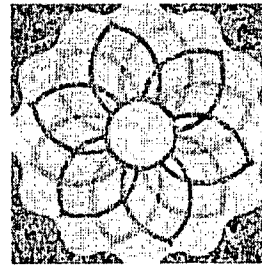
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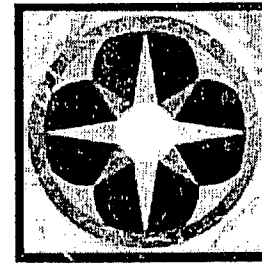
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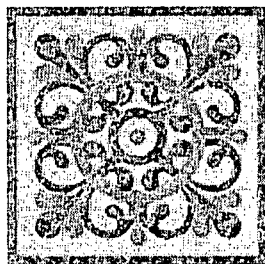
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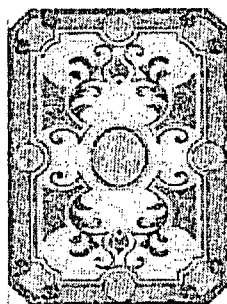
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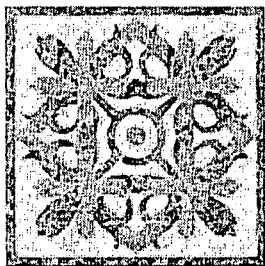
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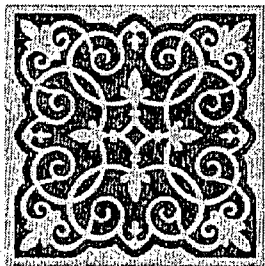
WS-867



WS-928



WS-868



WS-935

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We supply beautiful water jet medallions and tile borders for both residential and commercial flooring projects. All of our water jet medallions come with aluminum backing for easy installation.

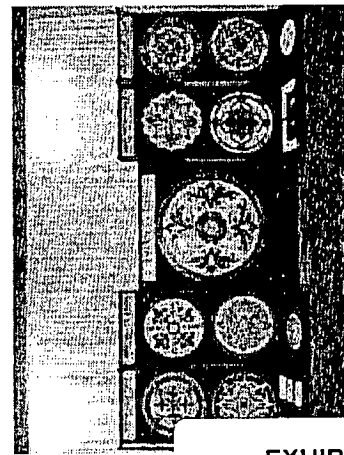
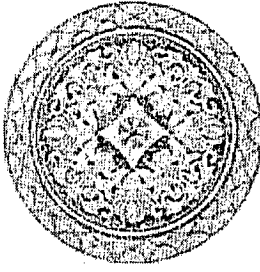
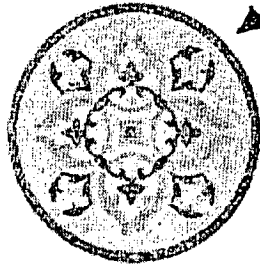


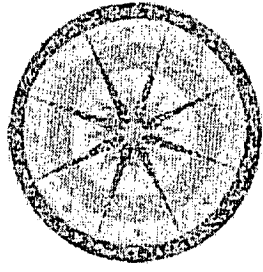
EXHIBIT L-9
PAGE 41



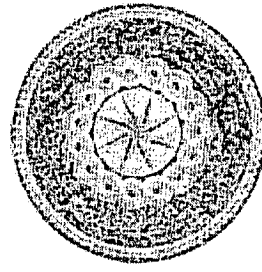
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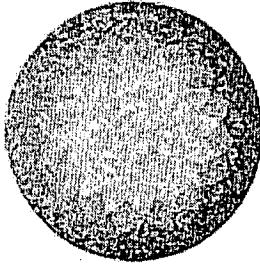
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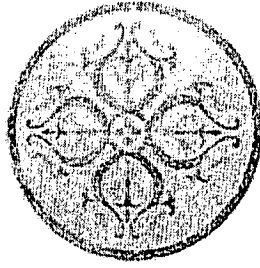
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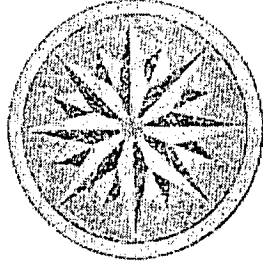
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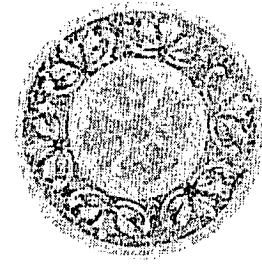
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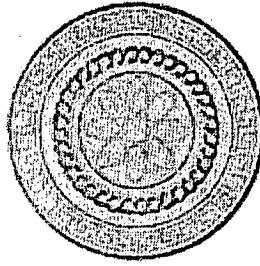
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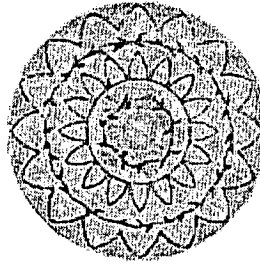
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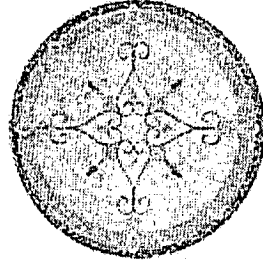
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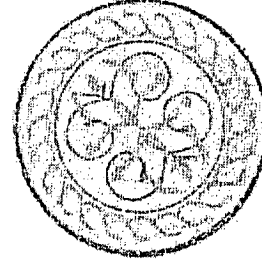
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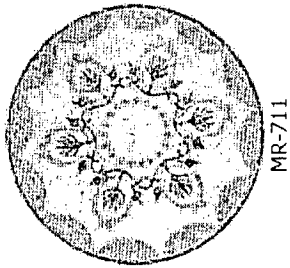
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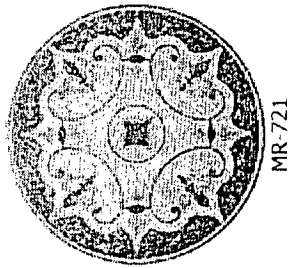
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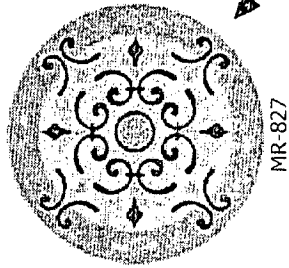
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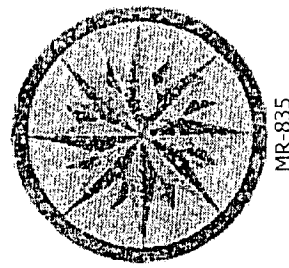
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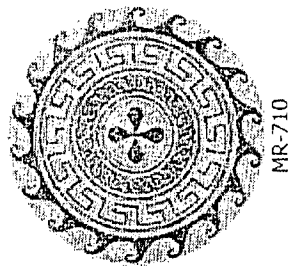
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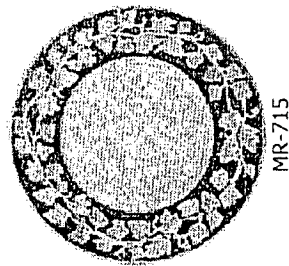
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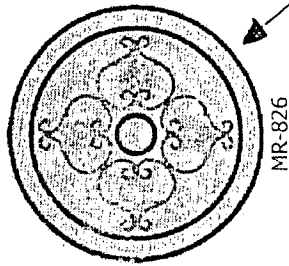
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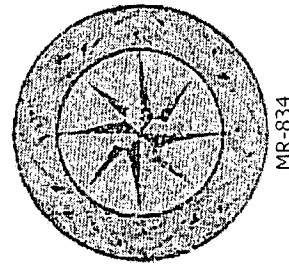
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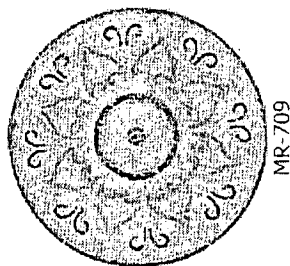
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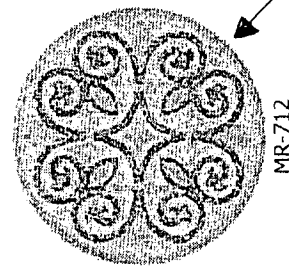
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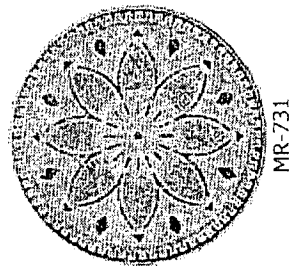
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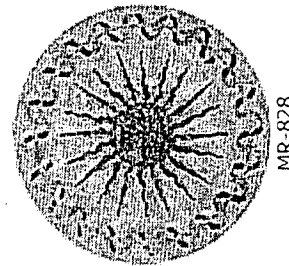
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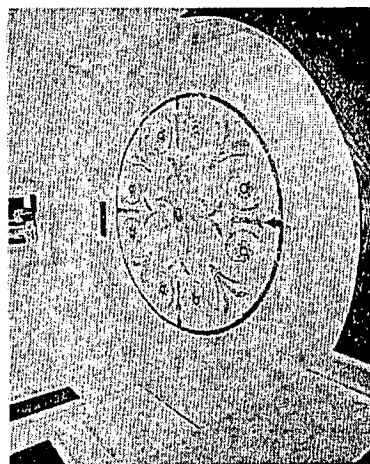
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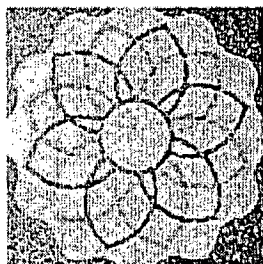


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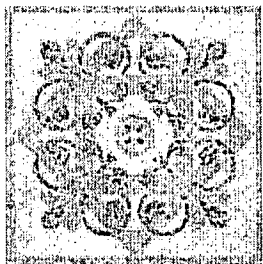


MR-828





MS-730



MS-770

MS-772

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JS 44 (Rev. 12/07)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

HONOR LIFE, INC.

(b) County of Residence of First Listed Plaintiff SAN DIEGO, CA
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Douglas W. Lytle, Esq. / SBN 178315 - Duckor Spradling Metzger & Wynne, 3043 4th Ave., San Diego, CA 92103

DEFENDANTS

UNICORN TILE CORPORATION, et al

County of Residence of First Listed Defendant ORANGE, CA
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

08 CV 1008 L POR

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|-----------------------------------------|----------------------------|----------------------------|---------------------------------------------------------------|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | | |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER/STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition		

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district (specify)
- ☐ 6 Multidistrict Litigation
- ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

17 USC 101
Brief description of cause:
Copyright Infringement

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

06/05/2008

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # 15643

AMOUNT

2350

APPLYING IFP

JUDGE

MAG. JUDGE

TAC

6/5/08

**UNITED STATES
DISTRICT COURT**
SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO DIVISION

151643 - TC

**June 05, 2008
14:50:09**

Civ Fil Non-Pris

USAO #.: 08CV1008

Judge.: M. JAMES LORENZ

Amount.: \$350.00 CK

Check#.: BC7647

Total-> \$350.00

FROM: HONOR LIFE, INC

V.

UNICORN TILE CO.

AO 121 (6/90)

TO: Register of Copyrights Copyright Office Library of Congress Washington, D.C. 20559	REPORT ON THE FILING OR DETERMINATION OF AN ACTION OR APPEAL REGARDING A COPYRIGHT
-------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------

In compliance with the provisions of 17 U.S.C. 508, you are hereby advised that a court action or appeal has been filed on the following copyright(s):

<input type="checkbox"/> ACTION	<input type="checkbox"/> APPEAL	COURT NAME AND LOCATION
DOCKET NO. 08cv1008	DATE FILED 6/5/2008	United States District Court, Southern District of California 880 Front Street, Room 4290 San Diego, CA 92101-8900
PLAINTIFF Honor Life, Inc.		DEFENDANT Unicorn Tile Corporation et al
COPYRIGHT REGISTRATION NO.	TITLE OF WORK	AUTHOR OF WORK
1 VA 1-353-112	4028-01	Honor Life, Inc.
2 VA 1-311-707	2830-01	Honor Life, Inc.
3 VA 1-311-700	3940-01	Honor Life, Inc.
4 VA 1-311-699	3075-01	Honor Life, Inc.
5 VA 1-311-698	2930-01	Honor Life, Inc.
6 VA 1-299-787	3205-01	Honor Life, Inc.
7 VA 1-299-781	3026-01	Honor Life, Inc.
8 VA 1-380-758	2275-01	Honor Life, Inc.

In the above-entitled case, the following copyright(s) have been included:

DATE INCLUDED	INCLUDED BY		
	<input type="checkbox"/> Amendment	<input type="checkbox"/> Answer	<input type="checkbox"/> Cross Bill <input type="checkbox"/> Other Pleading
COPYRIGHT REGISTRATION NO.	TITLE OF WORK	AUTHOR OF WORK	
1			
2			
3			

In the above-entitled case, a final decision was rendered on the date entered below. A copy of the order or judgment together with the written opinion, if any, of the court is attached.

COPY ATTACHED <input type="checkbox"/> Order <input type="checkbox"/> Judgment		WRITTEN OPINION ATTACHED <input type="checkbox"/> Yes <input type="checkbox"/> No		DATE RENDERED
CLERK		(BY) DEPUTY CLERK		DATE

Copy 1 - Upon initiation of action, mail this copy to Register of Copyrights Copy 2 - Upon filing of document adding copyrights, mail this copy to Registrar of Copyrights

Copy 3 - Upon termination of action, mail this copy to Registrar of Copyrights Copy 4 - In the event of appeal, forward this copy to the Appellate Court so they can prepare a new AO 279 for the appeal

Copy 5 - Case file copy